**BEFORE THE ARIZONA CORPORATION COMMISSION**



**CARL J. KUNASEK**
**Chairman**
**JAMES M. IRVIN**
**Commissioner**
**WILLIAM A. MUNDELL**
**Commissioner**



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| **IN THE MATTER OF U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH § 271 OF THE TELECOMMUNICATIONS ACT OF 1996** | Docket No. T-00000B-97-0238<br>**AT&T AND MCIW'S COMMENTS ON SELECTION CRITERIA** |

AT&T Communications of the Mountain States, Inc. ("AT&T") and MCI WorldCom, Inc. on behalf of its regulated subsidiaries ("MCIW") provide their comments on the criteria for the selection the third-party consultant and test transaction generator.

## I. INTRODUCTION

Two of the most important decisions that will be made in the collaborative test process will be the selection of a qualified test transaction generator and third-party consultant. Qualified, competent vendors can help ensure that the test processes move forward effectively and quickly. Additionally, qualified, competent vendors can help ensure that the Commissions and participants have confidence in the results produced by the collaborative process. Ideally, at the conclusion of the collaborative test, the collaborative test process and the results produced by the process are beyond reproach by all parties.

Selection of an unqualified vendor can have troubling consequences. For example, in Georgia, the Georgia Commission concluded that the third-party vendor

originally selected by the Georgia Commission did not have the wherewithal to perform and complete its testing obligations in a timely fashion. As a result, a second vendor was brought in mid-stream to assume duties originally assigned to the initial vendor. Needless to say, the Georgia third-party test suffered delays because an unqualified vendor was originally chosen.

## II. CHARACTERISTICS OF A QUALIFIED VENDOR FOR THE THIRD-PARTY TEST

To help ensure that the most qualified third-party vendor(s) are chosen for the Arizona collaborative test, AT&T and MCIW propose the following minimum criteria:

- The vendor must be demonstrably neutral, and be able to establish independence from U S WEST.
- The vendor should have experience in building test plans and performing comprehensive tests of information systems interfaces.
- The preferred experience of the vendor should include building and testing telecommunications OSS and OSS interfaces.
- The vendor should have experience in management consulting.
- The vendor should have experience in conducting operational audits.
- The vendor should have experience in statistical analysis.

AT&T and MCIW recognize that, with the exception of the criteria on experience in conducting operational audits, the Commission's RFP requires information be provided in the vendor's proposal that cover all of the criteria that AT&T and MCIW have suggested. The purpose of the following comments is to provide additional details on what the criteria mean to the selection process and how the Commission might

interpret the information contained in the various proposals. These comments should not be construed as a criticism of the RFP.

**A. The vendor must be demonstrably neutral, and be able to establish independence from U S WEST.**

This may be one of the most important of the criteria. As an initial matter, the vendor's participation in the Arizona collaborative test process should not be clouded by a question of how that participation and the opinions of that vendor may affect current or future business that the vendor has with U S WEST. The vendor should be in a position to objectively perform its duties and to honestly report its findings without fear of how its participation will affect its bottom line.

A proper test will require the vendors to report more than just the facts; the vendor will also be expected to render an opinion based on those facts as to the adequacy of U S WEST's interfaces or provide subjective, qualitative evaluation. The successful vendor should acknowledge that it will be required to share professional opinions that may not be liked by U S WEST or the other parties.

AT&T and MCIW recognize that it is likely that any potential vendor may have past or existing relationships with U S WEST and/or other parties in this proceeding. There may be some vendors that have intimate, prior knowledge of the specific interfaces that U S WEST provides to competitive local exchange carriers ("CLECs"). One of the goals of the Arizona collaborative process is to determine how easy or difficult it would be fore a CLEC to develop working interfaces with U S WEST. A vendor with prior knowledge of U S WEST's interfaces would not be able to replicate the experience that a CLEC without prior knowledge of U S WEST's interfaces would have. Prior knowledge

of U S WEST's interfaces in one way or another contaminates virtually all of the various tests that are contemplated in this proceeding. For example, a vendor may be able to establish connectivity with U S WEST's interfaces much more quickly and easily then would a new CLEC because of the vendor's prior knowledge of U S WEST's interfaces that may not be entirely reflected in the documentation and support that U S WEST provides to CLECs.

Should a vendor be selected that has or had prior contractual relations with, or specific knowledge of, U S WEST's interfaces, that vendor should be required to certify that no employee with specific knowledge of U S WEST's interfaces and OSS will participate in the Arizona collaborative test process. To keep the test process fair, only employees with no prior knowledge of U S WEST's interfaces and OSS should be directly or indirectly involved with the Arizona collaborative test.

**B. The vendor should have experience in building test plans and performing comprehensive tests of information systems interfaces.**

An efficient, timely and reliable test should not include "on the job training." A qualified third-party vendor should have demonstrated experience and expertise in building comprehensive and robust test plans and performing comprehensive tests of information systems interfaces. Timely completion of the tests and reliable results cannot wait for the vendor to move up the learning curve on test plan development and testing of information systems interfaces.

**C. The preferred experience of the vendor should include building and testing telecommunications OSS and OSS interfaces.**

The successful vendor(s) should also have experience with telecommunications OSS and OSS interfaces. This test should not permit a vendor to gain "on the job

training" with respect to knowledge of telecommunications OSS and OSS interfaces. A qualified third-party vendor should have demonstrated experience in building and testing telecommunications OSS and OSS interfaces.

**D. The vendor should have experience in management consulting.**

The execution of the collaborative tests in Arizona will not be without problems along the way. Problems should be anticipated. When those problems arise, the successful vendor(s) should be able to help solve the problems. Demonstrated experience and expertise in management consulting will indicate the vendor's capability in solving problems. Specifically, the successful vendor should have proven experience with "root cause" analysis.

**E. The vendor should have experience in conducting operational audits.**

While this test will require a vendor to develop and test interfaces and OSS, it will also require operational audits of U S WEST's retail, wholesale and performance measurement processes. Systems development and testing are very different skill sets then operational audits. The evaluation of potential vendors should focus both on the vendor's systems development and testing capabilities, as well as on a vendor's capabilities to perform operational audits.

**F. The vendor should have experience in statistical analysis.**

The collaborative test process will produce tremendous amounts of data that must be reviewed and analyzed. The successful vendor should demonstrate a capability to perform the necessary statistical analyses of the data that is produced in the test process. In particular, the successful vendor should have the ability to perform permutation testing of the test data. Permutation testing requires specialized statistical software and the

knowledge to run the tests. Like with operational audits, statistical analysis requires unique skills and expertise. The vendor evaluation process should consider the level of statistical skills and knowledge that the vendor possesses.

## III. RESPONSE TO U S WEST'S COMMENTS

### A. The purpose of the collaborative test is to evaluate the access that U S WEST provides to its OSS.

AT&T and MCIW would like to respond to several of the statements that U S WEST made in its performance measurement comments.[1] U S WEST has stated that, "[t]he purpose of the OSS test is to test U S WEST's electronic interfaces."[2] U S WEST is inappropriately trying to narrow the scope of the test to only the electronic interfaces. The proposed Master Test Plan already recognizes that the purpose of the test is to test "the access to OSS that U S WEST provides to CLECs."[3]

The Federal Communications Commission ("FCC") views the electronic interface as only one of three main components to access to a BOC's interfaces. For purposes of evaluating access to OSS functions, the FCC has stated that several components must be examined, including: (1) the point of interface, or "gateway," for the CLEC's own internal OSS to interconnect with the RBOC (U S WEST's electronic interface); (2) any electronic or manual processing link between that interface and the RBOC's internal OSS, including all necessary back office systems, processing procedures, and personnel; and (3) all of the internal OSS (or "legacy systems") that the RBOC uses in providing

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[1] Before the Arizona Corporation Commission, *U S WEST Communications, Inc.'s Compliance with §271 of the Telecommunications Act of 1996*, Docket No. T-00000B-97-0238, U S WEST's Position Statement and Appendix Regarding Performance Measures ("U S WEST Comments"), September 24, 1999.
[2] U S WEST Comments, p. 3.
[3] Master Test Plan for Testing U S WEST's Operational Support Systems in Arizona, Arizona Corporation Commission, Issue 1.0, August 1999, p. 7.

network elements and resold services to a CLEC.[4] The FCC has rejected arguments that the duty of nondiscriminatory access is satisfied by merely installing the interface component.[5] Consequently, the test should examine all three of the major components to OSS access and should not be limited to only the electronic interface component.

**B. Parity should be determined using an equal risk approach.**

Statistical tests are used to answer the question of whether a difference in two sets of data can be attributed to random chance or systematic differences. In the context of a non-discrimination evaluation, random chance would indicate that nondiscrimination is present and systematic differences would indicate that discrimination is present. However, in any statistical test there is a probability of reaching the wrong conclusion. A conclusion of discrimination when there is actually no discrimination (*i.e.,* jailing the innocent) is described as a Type I error. A conclusion of nondiscrimination when there actually is discrimination (*i.e.,* setting free the guilty) is described as a Type II error. In performing a statistical test, one of the choices that the statistician makes is how many or how few Type I or Type II errors can be tolerated. The amount of Type I or Type II errors inherent in a statistical test is expressed as the confidence level of the test. The confidence level is usually expressed as a percentage (*i.e.,* 85%, 95%, and 99%).

AT&T and MCIW believe that a confidence level that leads to equal risk of Type I and Type II errors should be applied. A confidence level of 85% should produce roughly equal probability of Type I and Type II errors. The higher the confidence level, the lower the probability of falsely concluding that there is a systematic difference in two

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[4] *Application of Ameritech Michigan Pursuant to Section 271 of the Communications Act of 1934, as amended, To Provide In-Region InterLATA Services in Michigan,* CC Docket No. 97-137, Memorandum Opinion and Order, FCC 97-298 (rel. Aug. 19, 1997), ¶ 134 (*"Ameritech Michigan Order"*).
[5] *Ameritech Michigan Order,* ¶ 135.

sets of data when, in fact, the difference is due to random occurrence (a Type I error). Of course, U S WEST would like to minimize the probability of Type I errors.

However, a high confidence level greatly increases the probability of falsely concluding that there is no systematic difference in two sets of data when in fact there is (a Type II error). From the CLEC's perspective, the statistical test procedure should be designed so as to minimize the probability of Type II errors.

Both types of errors are important in determining whether parity of access has been and is being delivered to the CLEC. Type II errors are as real as Type I errors and may be more harmful to competition. As a result, there may be instances in which U S WEST is not providing equal service to the CLEC, however, purely by chance, the statistical test fails to detect this problem. In any event, it is necessary to strike a balance between Type I and Type II errors. Because sample sizes cannot be controlled, if the Type I error rate selected in the statistical methodology is too small, the Type II error rate will be large. The converse is also true.

Clearly, U S WEST has arbitrarily selected confidence levels of 95% and 99% because it wants to reduce the risk that it will be falsely accused of providing discriminatory service to the CLEC.[6] Under U S WEST's proposal, although there is a smaller risk of a Type I error occurring (a smaller risk of declaring U S WEST to be out of parity when it is really achieving parity), there is an increased risk of a Type II error (not declaring U S WEST to be out of parity when in fact it is). Thus, U S WEST's proposed statistical methodology is necessarily biased in its favor. The only fair and rational basis for determining how low the risk of false accusation should be is to equalize the risks borne by U S WEST and the CLEC of any error counter to its interests.

Fairness and the Telecommunications Act of 1996 require regulators to develop a statistical test that treats incumbent local exchange carriers and CLECs equally.

Statisticians have concluded that a confidence level of 85% will produce approximately equal probabilities of Type I and Type II errors. As such, AT&T and MCIW urge the Commission to require that statistical test be performed at an 85% confidence level. This will produce fair treatment of both U S WEST and the CLECs and produce a result that nearly equalizes the probability of Type I and Type II errors.

## IV. RECENT FCC GUIDANCE ON THIRD PARTY TESTING

The FCC recently provided U S WEST with guidance on the important elements that should be included in a successful third party test.[7] A copy of the letter providing this guidance is attached to these comments as Exhibit A. AT&T and MCIW are encouraged to see that the FCC shares AT&T's and MCIW's view of many of the important third-party test elements. AT&T and MCIW also submit that the FCC's letter echoes comments that AT&T and MCIW already made in their earlier filings.[8] AT&T, MCIW and the FCC appear to have consistent views in the areas of performance measurement evaluation, change management, documentation evaluation, xDSL testing, stress volume capacity testing, the use of a pseudo-CLEC, and open processes.

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[6] U S WEST Comments, p. 4.

[7] Letter from Lawrence E. Strickling, Chief Common Carrier Bureau to Nancy E. Lubamersky, Executive Director Regulatory Planning, U S WEST, September 27, 1999. A copy of that letter is attached to these comments as Exhibit A.

[8] Before the Arizona Corporation Commission, *U S WEST Communications, Inc.'s Compliance with §271 of the Telecommunications Act of 1996*, Docket No. T-00000B-97-0238, AT&T and TCG's Comments on Proposed Master Test Plan; MCI WorldCom's Preliminary Comments on the Arizona Master Test Plan (September 17, 1999).

## VI. SPECIFIC COMMENTS ON RESPONSES TO THE REQUEST FOR PROPOSAL

### A. Hewlett-Packard Proposal

AT&T and MCIW have great concerns about Hewlett-Packard's ("HP") response to the RFP. While the exact nature of the relationship has never been formally or completely disclosed, U S WEST contracted with HP to build U S WEST's IMA and EDI interfaces. For HP to propose to evaluate the very interfaces it has developed represents the epitome of a conflict of interest. Even if HP uses employees in the OSS evaluation that were not involved in the development of U S WEST's IMA and EDI interfaces, the conflict of interest is still significant. In addition, HP has previously tested U S WEST's IMA interface and U S WEST has relied on that testing in its Section 271 filing in Arizona to demonstrate the purported adequacy of the IMA interface.[9] Again, the testing that HP has already done on the IMA interface represents a significant conflict of interest.

AT&T and MCIW expect that a proper and thorough evaluation of U S WEST's interfaces will uncover several, significant deficiencies. When that occurs, HP will be put in the unenviable position of effectively criticizing its own development efforts. If HP does identify the inadequacies of the very interfaces it helped develop, U S WEST will likely question why it chose HP to develop the interfaces in the first place if HP itself doesn't think that the interfaces are good enough. AT&T and MCIW are fearful that the more likely outcome if HP is involved in the test is that there will be a bias towards glossing over or minimizing the impact of any identified deficiencies.

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[9] Before the Arizona Corporation Commission, *U S WEST Communications, Inc.'s Compliance with §271 of the Telecommunications Act of 1996*, Docket No. T-00000B-97-0238, Affidavit of Dean W. Buhler, U S WEST Communications, March 25, 1999, p. 7.

In fact, that very situation has already occurred. Jim Roberts, an HP employee, testified on behalf of U S WEST in a proceeding in Colorado defending the adequacy of the IMA-GUI.[10] In that testimony, Mr. Roberts disclosed that HP had developed IMA and was developing the EDI interface.[11] Given that over nineteen months ago HP went on the record identifying its role in the IMA and EDI interface development and then testified as to the adequacy of IMA, it strains credulity that HP can now propose to conduct an unbiased evaluation of those interfaces.[12]

Notwithstanding the significant conflicts of interest that already exist, HP in its response to the RFP failed to disclose, as was required in Section VI. 7. and 8. of the Commission's RFP, the extensive and significant relationships between HP and U S WEST. HP should have disclosed that it had built the IMA-GUI, helped build the EDI interface, tested the IMA-GUI interface and testified on behalf of U S WEST to the adequacy of the IMA-GUI in its response to the RFP. This is certainly relevant information that the Commission should have when it considers HP's proposal.

HP's existing conflicts of interest and its failure to disclose those conflicts of interest should be strongly considered when the Commission chooses the vendor for the test transaction generator. The selection of HP as the test transaction generator may damage the credibility of the overall process and could undermine the confidence that the parties have in the evaluation process.

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[10] Before the Public Utilities Commission of the State of Colorado, *Regarding the Investigation of: (1) U S WEST's Interconnection Mediated Access System for Compliance With the Telecommunications Act of 1996, the FCC's First Report and Order, and Pertinent Commission Directives Related Thereto; and (2) Whether the Commission Should Order the Implementation on or Before December 31, 1997, of an Electronic Data Interchange System of Other Available Long Term Solutions for Access to U S WEST's Operations Support Systems*, Docket No. 97C-432T, Hearing Transcript, January 30, 1998, pp. 134 – 232. ("Roberts Testimony").

[11] Roberts Testimony, p. 140.

[12] Roberts Testimony, pp. 152 – 153.

**B. Telcordia Proposal**

AT&T had many criticisms of the test plan that Telcordia developed in the Texas collaborative testing and Telcordia's execution of that plan.[13] AT&T is concerned that similar issues may be encountered in Arizona if Telcordia is chosen as the third-party consultant. To ensure that the Commission has all of the relevant information necessary for it to make an informed decision on a third-party consultant, AT&T has attached its Texas comments to this document as Exhibit B.

RESPECTFULLY SUBMITTED this 29th day of September, 1999.

AT&T COMMUNICATIONS OF
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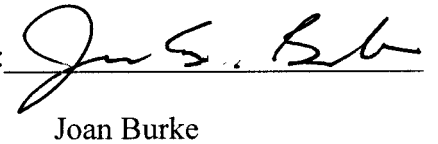
By: 

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[13] Before the Public Utility Commission of Texas, *Operation Support Testing Relating to the Investigation into Southwestern Bell Telephone Company's Entry into the interLATA Telecommunications Market in Texas*, Project No. 20000, AT&T Communications of the Southwest, Inc.'s Comments on Telcordia's Interim Test Results, August 2, 1999.

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## CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of AT&T and MCIW's Comments on Selection Criteria were filed this 29th day of September, 1999, with:

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and that a copy of the foregoing was sent via United States Mail, postage prepaid, this 29th day of September, 1999 to the following:

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# A

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September 27, 1999

Nancy E. Lubamersky
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Dear Ms. Lubamersky:

During the course of the last several weeks, members of the Common Carrier Bureau's Policy and Program Planning Division ("Division") have met with representatives from U S WEST to discuss third-party testing of operations support systems ("OSS") and the competitive local exchange carriers ("CLECs") access to those systems. The Commission has previously indicated that for a Bell Operating Company ("BOC") to obtain approval under section 271 of the Telecommunications Act of 1996 to provide in-region, interLATA services, it must demonstrate that it provides to CLECs nondiscriminatory access to its OSS and that its systems are operationally ready and capable of handling reasonably foreseeable demand. A number of companies, including yours, have undertaken or are developing independent third party tests of their OSS.

The purpose of the discussions between Division staff and interested parties has been to provide guidance on important elements that a third-party test should include to assist our determination that a BOC is providing nondiscriminatory access to its OSS. These views represent the current thinking of the Common Carrier Bureau and are in no way binding on the Commission. Any final determination concerning whether a BOC is providing nondiscriminatory access to its OSS will be made based upon the record in a section 271 application. It is my hope, however, that the Bureau's views on these issues will be helpful to you and other Bell Operating Companies in formulating successful section 271 applications.

## 1. Performance Measure Evaluation

A thorough and well-documented independent assessment of the data collection and calculation processes for performance data will considerably facilitate the Commission's review of a section 271 application. An independent review of the performance measurements is crucial in determining the accuracy and validity of performance data. In particular, the staff believes that such an independent review would include the following qualitative and quantitative aspects.

- An evaluation would include an assessment of whether the raw data being collected by the BOC is accurate, which could be tested by observing the raw data collection processes and by comparing the BOC's raw data to independently-collected data.

- The evaluation would assess the processes by which the raw data is filtered and transformed into final, reported results.

- The evaluator would assess whether the BOC's data collection and data processing functions are consistent with the published performance measurement business rules.

- The evaluator would assess the adequacy and functioning of the BOC's internal controls over the data collection processes and the software programs that process the data (such as the controls over personnel access to the databases, and the controls that ensure that the programs and program modifications are properly authorized, documented, tested and approved).

- The evaluation would include an independent quantitative verification of the reported performance data. To accomplish this, the evaluator could be provided with the BOC's raw data and independently process the data, pursuant to the business rules, to ensure that the stated calculations and algorithms have been accurately applied.

We note that a comprehensive evaluation of the BOC's performance measure processes may include elements in addition to those listed above, as determined by the states or by an independent evaluator. Accordingly, we encourage BOCs to make the details of the proposed evaluation available to the Commission, and to the public, as they are developed.

## 2. Change Management Test

We also believe it critical that there be an independent review of a BOC's change management process and procedures as well as its implementation of these procedures.[1] The change management test should provide information which can be used to evaluate the methods and procedures that the BOC employs to communicate with CLECs regarding OSS system performance and system updates. The independent evaluator should assess the BOC's change management processes and should include, but not be limited to, a review of the BOC's ability to implement at least one significant software release. The following

[1] For purposes of this discussion, we use the phrase "change management process" as referring to the management of changes to OSS interfaces that affect CLECs' production or test environments. Such changes may include: 1) operations changes to existing functionality that impact the CLEC interface(s) upon a BOC's release date for new interface software; 2) technology changes that require CLECs to meet new technical requirements upon a BOC's software release date; 3) additional functionality changes that may be used at the CLEC's option, on or after a BOC's release date for new interface software; and 4) changes that may be mandated by regulatory bodies.

elements would be indicative, but not dispositive, of a satisfactory change management process and should be evaluated by the independent third-party:

- CLEC Participation: CLECs would have a role in the development of, and modifications to, the change management process.

- Release Implementation: Prior to issuing a new software release or upgrade, the BOC would provide a testing environment that mirrors the production environment in order for CLECs to test the documentation for the new release. The testing environment would be stable (*i.e.*, no changes by the BOC), and would be maintained for an adequate time-period, at least 30 days, for the CLECs to test. To ensure CLECs are not forced to cut over to a new release prematurely, a BOC could adopt a "Go/No Go" vote process to decide whether to implement a new release. Pursuant to this process the new release is delayed if a majority, such as two-thirds, of eligible CLECs vote to delay the release. Similarly, a BOC could maintain a pre-existing version, or versions, of the interface (*e.g.*, Electronic Data Interchange) when issuing a new release rather than switching directly from one version to the next.

- Memorialization of Process: The change management process would be clearly memorialized and set forth in one document that can be readily accessed by the CLECs. Any modifications to the change management process would be included with this document.

- Dispute Resolution: There would be a dispute resolution process for change management that is separate and apart from any process that is set forth in interconnection agreements. This would provide CLECs a forum specifically designated to resolve any change management disputes.

### 3. xDSL Testing

The third-party test would test significant volumes of xDSL orders (*i.e.*, xDSL capable loops).

### 4. Normal, High, and Stress Volume Testing

- Normal and High Volume Testing: The third-party test would test projected normal and high volumes of pre-order and order transactions that flow-through the BOC's systems.[2] The mix of transactions would replicate expected CLEC

[2] An incumbent LEC's internal ordering system permits its retail service representatives to submit retail customer orders electronically, directly into the ordering system. This is known as "flow-through." Similarly, a competing carrier's orders "flow through" if they are transmitted electronically (i.e., with no manual intervention) through the gateway into the incumbent LEC's ordering systems. Order flow-through applies solely to the OSS ordering function, not the OSS provisioning system. In other words, order flow-through measures only how the competing carrier's order is transmitted to the incumbent's back office ordering system, not how the incumbent ultimately completes that order. Electronically processed service

ordering patterns by including, for instance, error conditions and change orders, and by covering the process end-to-end (*i.e.*, through the receipt of order confirmation notice or electronic error notice). "Normal" volumes would be based on the BOC's reasonable estimate, with input from CLECs, of daily order volumes. "High" volumes would be significantly greater than normal volumes and based on the BOC's reasonable estimate, with input from CLECs, of forecasted demand.

- Capacity or Stress Testing: The third-party stress test would assess scalability of the BOC's OSS systems by testing a mix of transactions similar to those in the normal and high volume testing. These volumes would be significantly greater than the high volume test and be sufficient to identify potential weak points in the systems.

## 5. Pseudo-CLEC

If no CLEC has constructed an interface with whatever OSS system the BOC is relying on to meet the nondiscriminatory obligations set forth in the 1996 Act, the third-party tester should build a pseudo-CLEC. The pseudo-CLEC should build an interface not only to test the quality of the BOC's documentation for such OSS systems but also to ensure that these systems are capable of submitting and receiving valid transactions. The pseudo-CLEC should build the interface(s) using the BOC's documentation and business rules to determine whether any CLEC can build an interface based upon these materials. Third-party testing can be conducted using orders from a combination of existing CLECs and a pseudo-CLEC.

## 6. Dissemination of Information

A third-party test of OSS should include a formal, predictable and public mechanism for the third-party tester to communicate to both the BOC and the CLEC community issues identified by the third-party tester that arise during the course of testing. Staff proposes the following options for reporting problems:

- Report issues as they arise; or
- Issue reports pursuant to a specified time-frame (*i.e.*, weekly or bi-weekly); or
- Issue an interim report in the middle of the test and a final report at the end.

Combinations of these options could provide optimal balance between frequency and detail.

## 7. Functionality

- CLECs would be consulted in developing the test scenarios to reflect their market entry and growth and expansion scenarios in a particular region.

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orders are more likely to be completed and less prone to human error than orders that require some degree of human intervention.

- Functionality testing would be conducted for pre-ordering, ordering, provisioning, maintenance and repair, and billing transactions. The transaction mix should replicate CLEC ordering patterns and include, for instance, orders that fall out for manual processing, orders that contain errors, and order changes and supplements. Functionality testing also would test these transactions end-to-end (*i.e.*, orders should be actually provisioned), as applicable.

This letter is intended to provide a summary of staff views regarding key elements of a third-party test which could assist our determination that a BOC's OSS is operationally ready and capable of efficiently supporting ever-increasing volumes of transactions. It is not, however, intended to be an exhaustive list of the necessary elements for a successful third-party test. Moreover, it is possible that additional issues will be raised by interested parties in future section 271 dockets. I emphasize that any final determinations regarding whether a BOC is providing nondiscriminatory access to its OSS will be made by the Commission based on the record of the BOC's 271 application for a particular state. To this end, Bureau staff is committed to working with all parties to ensure that the section 271 application process is as orderly and predictable as possible.

For information purposes, a copy of this letter will be placed in CC Docket No. 98-121[3] and CC Docket No. 98-56.[4]

Sincerely,

Lawrence E. Strickling, Chief
Common Carrier Bureau

[3] Application of BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Provision of In-Region, InterLATA Services in Louisiana, CC Docket No. 98-121, Memorandum Opinion and Order, 13 FCC Rcd 20599 (1998).

[4] Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance, CC Docket No. 98-56, Notice of Proposed Rulemaking, 13 FCC Rcd 12817 (1998).

# B

**PROJECT NO. 20000**

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|---|---|---|
| **OPERATIONS SUPPORT TESTING RELATING TO THE INVESTIGATION INTO SOUTHWESTERN BELL TELEPHONE COMPANY'S ENTRY INTO THE INTERLATA TELECOMMUNICATIONS MARKET IN TEXAS** | § | **PUBLIC UTILITY COMMISSION OF TEXAS** |

**AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.'S COMMENTS ON TELCORDIA'S INTERIM TEST RESULTS**

## I. INTRODUCTION

Telcordia's Interim Report announces alarming results for companies entering or expanding their presence in the Texas local services market. On fifty-percent of tested order types for competitors offering local service using their own switching equipment (UNE-L orders), Telcordia found that **SWBT "did not meet expectations" for ordering and provisioning.** Interim Report, ES-9. Telcordia has not yet addressed **"the effectiveness or success of the pre-order function"** (*Id.* at ES-9), processes that are essential to place accurate and complete orders to transition customers to a competitor's services. At the other end of the process, specific categories of wholesale billing are still under investigation, including a review of whether **"what is billed is what is ordered,"** (*Id.* at 8-56), and the Interim Report discloses that SWBT does not consistently follow industry standards for wholesale billing. *Id.* at ES-10. "And it's one of the most important areas, because if you cannot bill your customers, you can't get any money back." Workshop, Tr. at 23-24 (7/22/99) (S. Khurana).[1]

Telecordia expressed **"serious concern"** with SWBT system capacity planning and **with high CPU utilization rates on those SWBT systems supporting ordering functions for**

[1] Wholesale billing problems in addition to those cited in the Interim Report have been communicated to Telcordia by AT&T. Billing raises particular concerns when examining OSS from a region-wide perspective because the rates for each of SWBT's states will be different, thus necessitating state-by-state review of billing accuracy.

**competitors.** During a day of system capacity testing, **utilization rates remained near 100 percent for than an hour**, and for three hours the rate exceeded 95 percent. *Id.* 5-34, 5-36. In addition, Telcordia advised, **SWBT's method of forecasting to determine the need for system capacity expansion is "insufficient to address the changing environment of CLEC competition."** *Id.* 6-13; *see also* ES-12.

Further and fundamentally, based on AT&T's analysis of Telcordia's review of historical performance measurement data (metrics tracking SWBT's performance category-by-category), **SWBT fails to meet the threshold quantitative targets** that this Commission has stated must be met to qualify SWBT for a positive recommendation on its application to the FCC for long distance entry.

Even with these strong criticisms, Telcordia's Interim Report sheds no light on many of the most critical OSS issues facing Texas CLECs today. As a result, the audience for Telcordia's Interim Report will gain little, if any, appreciation for the breadth and significance of other problems that surfaced during OSS testing in Texas. Moreover, the Interim Report completely disregards real life operational failures occurring during contemporaneous commercial activity. Nowhere in the report does Telcordia even wonder out loud why certain UNE-P conversion test orders succeeded in testing, **while execution of the same resale to UNE-P scenario in AT&T's commercial environment caused 86 percent of the initial group of transitioned AT&T customers to lose outbound calling capability**. Telcordia's explanation that observation of parallel commercial activity was "beyond the scope" of the Master Test Plan does not enhance the credibility of the testing and offers little consolation to a CLEC ramping up for high risk, broad-based residential entry.

Telcordia's Interim Report gives testimony to the disadvantages of relying on artificially constructed test cases, rather than on the level of commercial activity that can challenge ILEC systems and processes with increasing volume and variability. **Telcordia's Master Test Plan calls for no volume testing of the end-to-end functionality of SWBT systems and processes**

**supporting CLEC order activity.**[2] The one-day planned execution of system "capacity" testing is best designed to check CPU utilization load rates and file transfer capabilities, expressly ignoring manual processes and any of the steps ranging from actually provisioning the order to producing an accurate wholesale bill. **Even this limited system load "capacity" testing (which initially failed because of limitations at SWBT's end on its ability to receive simultaneous, rather than sequential, file transfers) was not sized to take into account peak usage associated, for example, with time-bound promotions, rendering Telcordia's report of disturbingly high CPU utilization rates particularly worrisome.**

Compared with alternative approaches to testing, including the "New York-style" of OSS testing, where the third-party became a pseudo-CLEC and examined issues ranging from EDI system documentation to change control processes for software releases, the Texas OSS test plan and execution come up woefully short.[3] Where Telcordia did not monitor how long it took SWBT to trouble shoot a problem in processing and provisioning an order,[4] the Final Report for Bell Atlantic deals extensively with account management and Help Desk support in resolving issues. Telcordia's Interim Report lowers any expectation that the testing here will deliver feedback beneficial to local competition, either by driving process improvements or by assuring CLECs that SWBT makes available adequate system requirement "blue prints" to justify the investment in costly EDI system development.

To be fair, AT&T's expectations regarding the Interim Report were not high. Given the serious limitations in the underlying test plan, the remaining glimmer of hope was that Telcordia

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[2] A total of only 340 test cases were executed over the entire course of the UNE-P functionality testing (Interim Report, 4-48), and no more than 50 orders were sent on any single day of the testing.

[3] Other states have followed the New York Commission's lead. This Commission had the disadvantage of having to make a decision on the scope of testing before the New York test results were available. Those results speak for themselves as to the value and wealth of information that is available from more comprehensive OSS testing.

[4] Telephone Conference, Tr. at 417 (7/27/99) (L. Feerick) (*The cited transcript is of a phone conference from which SWBT was excluded by the ALJ due to SWBT's unwillingness to share its testing issue log. This explanation is added to comply with Judge Siegel's direction that SWBT's lack of participation be noted when citing the transcript.)

might have pushed the envelope and insisted that the scope of testing be dramatically expanded, that the project be untethered from unrealistic time tables, and that it take into account experiences with "live" commercial orders. That has not happened.[5] Fundamentally, the Interim Report cannot address the ability of SWBT systems and processes to receive, provision, maintain, and produce accurate billing on CLEC orders because **the testing fails to replicate even for a single day the end-to-end challenges associated with the volume of orders anticipated in a live, competitive environment.**

AT&T has been a consistent critic of each iteration of Telcordia's Master Test Plan, none of which have been responsive to AT&T's original or repeated criticisms. The latest versions of the Master Test Plan, delivered months after test execution began, have been particularly discouraging. In response to AT&T criticism that "deliverables" stated in the Master Test Plan either were not materializing or were not being distributed -- including software release impact statements, test environment impact statements, weekly test summaries, SWBT root cause analyses, and test jeopardy management matrices – Telcordia issued a new version of the Master Test Plan in a pure revisionist mode to: (a) eliminate documentation or reporting requirements, (b) make deliverables optional, (c) change written documentation requirements to allow oral reporting instead, and (d) drop references to distributing test documentation to test participant contacts. Where earlier AT&T critiques of Telcordia's Master Test Plan were simply ignored, more recently AT&T's comments apparently have been used by Telcordia primarily as a guide to paper over -- rather than remedy -- reported deficiencies in the test plan and process.

AT&T understands that Telcordia has stated publicly that the Interim Report is a work-in-progress and that its analysis and "scrubbing" of data continue. AT&T has no confidence,

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[5] Telcordia was invited to but did not identify any scope of testing change it would have recommended to improve the ability of test results to predict future performance. Workshop, Tr. at 52 (7/22/99) (S. Khurana). One order type Telcordia apparently was concerned had been excluded, however, was CLEC-hopping (customers migrating from one CLEC to another). *Id.* at 18-19. SWBT recognizes at least some parallel between transitioning customers from resale to UNE-P and CLEC-hopping. Telephone Conference, Tr. at 192 (B. Lawson). Given the fact that AT&T's initial transmission of orders to move from resale to UNE-P resulted in loss of customer outbound call capability, AT&T is concerned that orders to transition customers from one CLEC to another may encounter the same difficulties.

however, that issues already identified in testing, but missing from the Interim Report, as well as other issues that may be revealed in re-testing, will be captured comprehensively in the Final Report. **More than one-half of the issues tracked on the issue log that AT&T maintained and exchanged during test execution do not appear on Telcordia's list of issues.** More significant than the raw count of issues omitted, is the importance of the overlooked issues. Problems that were not reported, or were reported with too little appreciation of their significance, include inaccuracy of SWBT-supplied pre-order information, customer loss of service on conversion from SWBT to AT&T, SWBT software release-related errors, discrepancies in SWBT's business rule documentation, slow and ineffective problem resolution, and delays in SWBT's back-end processing of CLEC service orders.

A major defect in the Interim Report is the almost complete failure to analyze the impact of the manual processing inherent in SWBT's systems, additional instances of which come to light on a recurring basis. **Is Telcordia waiting to see if SWBT's performance improves in the re-testing phase before providing any write up or even identification of the issue of manual processing?** Will the story not be told until it has a happier ending? If so, Telcordia missed the point of the Interim Report, which was to make public those issues uncovered to date in the OSS testing. This step was essential for the process to establish much needed credibility and, as importantly, to structure an appropriate re-test plan.

Unfortunately, Telcordia either took too lightly the task of producing an accurate, careful and informative interim report or lacked the necessary resources and time. Telcordia's command of SWBT's OSS and the challenges facing CLECs dependent on those OSS is less than clear. On a too frequent basis, questions posed directly to Telcordia during last Monday's Question and Answer (Q&A) phone conference, were intercepted up front or explained afterward by either Staff or SWBT or both. **Questions that Telcordia asked to have deferred until last Monday's Q&A session, are still left unanswered (e.g. why Telcordia will not be evaluating functionality test data against key performance measures, such as percent of flow through).** Although AT&T was promised an audit and explanation as to why issues appearing on the

AT&T-provided test log (*See* Attachment 1 hereto) were excluded from Telcordia's list of issues identified during testing, and a statement of which issues would be included in the Final Report, the earliest Telcordia could commit to provide the feedback was the day after AT&T's comments are due.

In other instances, Telcordia's responses led to serious concerns about the depth of understanding about how the industry works. For example, Telcordia proposed that an internal inconsistency in SWBT's own Local Service Order Requirements (LSOR) (i.e. documentation of what SWBT requires in the formatting and completion of local service orders) be resolved by having AT&T seek clarification from the OBF standards body. *See* Interim Report, Att. A, p. A-4, Issue FT- 2. Only after publication of its Interim Report did Telcordia revise its position and state that SWBT would be asked to provide missing explanatory notes to clear up the confusion in its documentation.[6]

AT&T's previously stated **concern that Telcordia (formerly known as "Bellcore") has attempted to resolve issues "off line" with SWBT without consulting CLEC test participants as to the efficacy of the fix continues.**[7] AT&T's more recent concern that Telcordia too readily replaced AT&T's root cause analysis with alternative explanations supplied by SWBT has grown. Last week, Administrative Law Judge Howard Siegel directed that SWBT, AT&T and MCI participate in an electronic exchange of test tracking logs in advance of a telephone conference scheduled the next day to discuss Telcordia's issue log. Telephone Conference, Tr. at 281-84 (7/26/99) (H. Siegel). No objection was raised at the time

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[6] Telephone Conference, Tr. at 385 (7/27/99) (J. Nix) (*The cited transcript is of a phone conference from which SWBT was excluded by the ALJ due to SWBT's unwillingness to share its testing issue log. This explanation is added to comply with Judge Siegel's direction that SWBT's lack of participation be noted when citing the transcript.)

[7] Telcordia refers to an "expeditious test process" whereby problems were found and addressed mid-testing. Tr. at 57 (7/22/99) (L. Feerick). AT&T obviously has no objection to quick problem resolution, but instead to work arounds that will not withstand the test of time or stress, and to proposed fixes that have not been shared with CLEC test participants and which, because they are implemented mid-stream, are not adequately covered in the existing testing process. Moreover, the implementation of fixes after phases of the testing have completed raises additional concerns as to what proper regression testing might find in unanticipated downstream and upstream impacts.

the exchange was ordered. While AT&T and MCI circulated their logs the following morning as required, SWBT's e-mail never arrived. At the last minute, **SWBT refused to share its test tracking documentation**, including the root cause analysis it fed to Telcordia. SWBT's reluctance to share documentation that earlier Master Test Plan versions required be distributed, should leave all concerned with an insecure feeling about the entire process.

Uneasiness about the entirety of the testing process also increased with recent statements that a requested description of SWBT's back-end system processing of CLEC orders cannot be provided because Telcordia believes the information is deemed proprietary to SWBT. **"I feel what you're wanting us to do is again address the back-end systems, which is a proprietary issue. And if we were to give you that information, we would be breaking our non-disclosure with Southwestern Bell."** Tr. at 155, 7/26/99 (Nix, J.). A third-party vendor focused on avoiding violations of a non-disclosure agreement with SWBT, dominated by time pressures, and subject to unknown resource constraints is not in a strong position to perform the necessary assigned duties. To relieve at least one layer of pressure, the Commission should require that SWBT make public all testing documentation (with test volunteer names redacted, as necessary), including SWBT's order-by-order (PON-By-PON) log supplied to Telcordia with root cause analysis, as well as SWBT's system reports of the occurrence of posting and error conditions for testing and retail orders during testing periods, SORD/SORT error reports for retail and wholesale, manual reject reports, and documentation supplied to Telcordia to validate performance measures data collection and reporting. Having gotten its way on the issue of whether Texas would engage in carrier-to-carrier testing, rather than true third-party testing, SWBT lost any claim that CLEC test participants should not be permitted to study all test data, reports, back up and documentation.

## II. OSS FUNCTIONALITY AND CAPACITY TESTING

### A. Claims Of Blindness And Life-Like Resemblance To Commercial Conditions Are Overstated.

"The issue of blindness from a functionality test perspective is an interesting one because as Howard Siegel put it, **you are trying to find Waldo. If there is not too much to hide him, then it is quite easy to find him right away. . . .** So the issue with blindness for the functionality test is very limited because of the limited amount of traffic, the production level traffic that's going through." Workshop, Tr. at 76 (7/22/99) (L. Feerick). The statement in Telcordia's Executive Summary that orders of CLEC test participants already in service "would not immediately be identifiable by SWB" (ES-2) is inaccurate. Each AT&T-sent test order was assigned a special testing AECN (account number), making each immediately recognizable as a test order. Worshop, Tr. at 76 (7/22/99) (L. Feerick). SWBT may not have known which described test scenario mapped to which volunteer account, but it knew the test scenarios and the time frame for both functionality and system capacity testing. Further, the precise orders used in the system capacity test (less than 20 orders cloned multiple times to achieve the prescribed volume level) were pre-sent to SWBT in advance of test execution to make sure they would flow through the system.

Telcordia's further statement that the level of blindness maintained meant "SWB did not have the opportunity to make special preparations for the tests," is equally inaccurate. Interim Report, ES-2. Of the approximately 3,700 resale to UNE-P migration orders that AT&T sent recently, more than one half were erroneously rejected. The explanation from SWBT was that the orders caused "congestion" at SWBT's interface because its queuing processors were configured to anticipate smaller volumes, based on historically lower numbers from AT&T. SWBT apparently changed the settings on its systems in anticipation of higher volumes in testing and later changed them back again. As SWBT noted in connection with capacity testing, "it was a surprise when Telcordia walked in, but we knew Waldo was there. . . ." Workshop, Tr. at 81 (7/22/99) (L. Ham).

When AT&T mixed in a handful of "live" orders during capacity testing, service order completions were never received. Only later was AT&T advised that SWBT was adding an additional "do not provision" FID and assigning dummy circuit codes to the test orders to keep

them from provisioning -- steps that should not have been necessary because the due dates were all months out precisely to allow cancellation before provisioning. SWBT claims that the addition of a special FID signaling the systems not to provision the test orders did not impact system response times and process flows, even though SWBT advised AT&T during testing that a facility assignment check was bypassed at SWBT's end as a result of the FID addition.

The question is not whether SWBT made special preparations in anticipation of the testing, but whether all of those preparations have been disclosed and their impact fully investigated. Additional questions are raised as to why Telcordia alerted SWBT to system slowness while the capacity testing was in progress. Telcordia's report that response time improved thereafter without any explanation (Interim Report, 5-34-35) raises serious concerns as to what results would have been reported if Telcordia had not initiated trouble shooting during actual test execution. And, Telcordia revealed that **"there may have been some handling trying to force some things through"** when AT&T, with approval of the Commission, sent a limited quantity of interactive orders during the capacity testing.[8] Further explanation of "work arounds" and any special processes relied on during testing is needed.

### B. Telcordia excluded from its Testing Issues Log (Interim Report, Attachment A) the majority of issues identified by AT&T as having been encountered during the UNE-P functionality and capacity tests.

*Omission of Reported Testing Issues.* Inconsistent and unarticulated standards were used to select issues for discussion in Telcordia's Interim Report. Although the Interim Report reveals significant shortcomings in SWBT's OSS in key areas, statements critical of SWBT's

[8] Telephone Conference, Tr. at 444-46 (7/27/99) (L. Feerick) (attempt to explain why 181 manual rejects were sent in response to 200 supplemental LSRs, while 19 of the orders received firm order confirmations)(*The cited transcript is of a phone conference from which SWBT was excluded by the ALJ due to SWBT's unwillingness to share its testing issue log. This explanation is added to comply with Judge Siegel's direction that SWBT's lack of participation be noted when citing the transcript.) Although supplements and cancellations were described in the Master Test Plan for inclusion in the capacity testing, neither was included, except as to 200 supplemental orders sent by AT&T outside the originally planned test cases in an attempt to validate conflicting information on whether supplements are MOG-eligible. Because SWBT erroneously sent back manual rejects on 181 of AT&T's 200 supplements (the notation of "invalid supp type" apparently had something to do with SWBT's assignment of dummy circuit codes to the capacity test orders), further data on how the orders would have been treated could not be gathered.

performance in other equally important areas are missing without explanation. In addition, positive statements appear liberally throughout the Interim Report without in depth analysis or validation. The fact that an issue is still under investigation or even beyond the scope of the testing did not dissuade Telcordia from making a judgment complimentary of SWBT's performance, but it did inhibit Telcordia from reporting poor performance in critical categories.

The raw data generated in testing demonstrates, for example, that SWBT relies heavily on manual processes, including manual generation and return of EDI responses. **More than one third of the rejects received during the UNE-P testing were generated and returned manually (i.e. via fax).** And at least 34 percent of manual rejects during the UNE-P testing were received outside of five hours after the LSR was submitted. Phone Conference, Tr. at 200, 204 (7/26/99) (J. Nix). The impact of SWBT's over reliance on manually generated records on the accuracy and timeliness of order processing and provisioning will be enormous. Yet, the main body of the Interim Report and its attached issue log (Interim Report, Attachment A) minimize the manual process issue and totally miss its impact. Even Telcordia's order-by-order (PON-by-PON) attachment does not capture which firm order confirmations (FOCs) and service order confirmations (SOCs) were returned manually; approximately 10 percent of those messages also were returned by fax during the UNE-P functionality testing. **In addition, Telcordia did not conduct a parity review to determine whether the ability to generate electronic error messages in SWBT's retail environment is superior to the electronically generated error message return available to CLECs.**[9]

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[9] When asked specifically about the SORD EDITS function available in conjunction with SWBT's retail EASE interface for the receipt of electronic reject notifications for errors detected in SORD, Telcordia responded as follows:

> [T]he analysis that I conducted was centered mainly in the mass market response unit handling the CLEC business. However, Southwestern Bell did, you know, indicate to me that the systems – for example, the SORD system would be, you know the same type of manual data entry process as would be used for the retail. . . . As far as the, you known detailed review of the SORD edits, I did not conduct a detailed review of SORD edits functioning, in conjunction with EASE interface.

Phone Conference, Tr. at 184 (7/26/99) (A. Stalgaitis).

Critical issues emerging during testing that have been communicated by AT&T on its daily issues logs for weeks and weeks were dropped without explanation. **In addition to Telcordia's failure to identify customer loss of dial tone as a problem that rated inclusion on the test log, Telcordia omits any description of SWBT's less than perfect execution of the May 1, 1999 EDI software release.** Inaccurate information (e.g. customer address, telephone number reservation, CLLI codes) retrieved from SWBT's pre-order interfaces was also overlooked on Telcordia's list, even in instances when SWBT's Local Service Center (LSC) confirmed that the information supplied to AT&T was incorrect.

Examples of other issues AT&T identified in its issue log that have not been found on Telcordia's log include:

- erroneous rejects, confusing use of error codes, and use of undocumented error codes
- defective and mis-formatted responses from SWBT including, missing header information, incomplete and fragmented circuit code identifiers, mis-matched REFNUM information
- delayed detection of feature incompatibility and failure to validate certain LSR optional fields
- lack of AA version designation on responses to initial LSR to facilitate tracking
- significant gaps in time (sometimes even days) between time stamps handwritten in manually returned forms and the time of AT&T's receipt of the fax from SWBT
- SWBT temporary inability to receive electronically submitted supplements
- failure of order to appear on exception log when installation due date was missed

While stating publicly that "[t]here were many issues associated that came up during the [UNE-P] test," Telcordia fails to share those with readers of the Interim Report. *See* Workshop, Tr. at 22 (7/22/98) (S. Khurana). One of the most puzzling explanations provided thus far as to why Telcordia chose not to include many of the issues on AT&T's testing log related to the timing of when the problems were detected. Test execution began in early April and extended into late June. Telcordia explained that some of AT&T's issues were reported after Telcordia

stopped its monitoring or observations.[10] Telcordia's decision not to be present at SWBT and/or AT&T premises on a particular date or after a particular date, even though test execution was in progress, should not cause issues to be ignored in the analysis.

Telcordia also failed to include all issues detected during UNE-P system capacity testing. *See* Attachment 1 hereto. In addition, conclusions Telcordia reaches in the body of the Interim Report concerning SWBT's system capacity planning and scalability, including comments based on monitoring during capacity testing, are not contained in Telcordia's issue log. Telcordia expressed "serious concern" with high average utilization over all applications on SWBT's MVS computer. *See* Interim Report, 5-39, 6-11.[11] **"Telcordia finds that maintaining CPU utilization at or very near 100 percent for hours could endanger the response time and possibly the stability of applications."** Interim Report, 6-11. Telcordia also concluded that the twice a year forecasting for the MVS environment and quarterly assessment of UNIX capacity are **"insufficient to address the changing environment of CLEC competition**, and should be prepared more often." Interim Report, 6-13. In addition, SWBT's practice of using an average hour over the business day as its metric to measure MVS utilization was criticized. Telcordia recommended that "**the existing CPU should be upgraded to a higher capacity one using a time-consistent busy-period approach for CPU utilization."** *Id.* 6-14.

These disconcerting capacity planning and system scalability issues should be identified on the issues log so that the Commission can determine whether SWBT has acted on Telcordia's recommendations and whether Telcordia has validated SWBT's corrective action. SWBT's ability to meet or not meet a handful of performance measures over the course of a single day of system capacity testing will be of little consequence if the systems are not stable from a capacity

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[10] *See* Telephone Conference, Tr. at 376-77 (7/27/99) (J. Nix) (reference to issues coming in during the last week of May when monitoring and actual observation did not occur)(*The cited transcript is of a phone conference from which SWBT was excluded by the ALJ due to SWBT's unwillingness to share its testing issue log. This explanation is added to comply with Judge Siegel's direction that SWBT's lack of participation be noted when citing the transcript.)

[11] EDI, LASR and MOG/SORD all reside on SWBT's MVS systems, along with numerous other applications, including real-time and batch application. Interim Report, 6-11.

planning and scalability perspective.

*Misinterpretation and Premature Closure of Issues.* Telcordia misinterpreted issues and prematurely closed issues that remain unresolved. For example, if the issue raised was why a manual reject had been received, Telcordia ignored the critical concern about manual responses, and chose instead to identify in the root cause column a description of the keystroke error that occurred in generating the LSR.[12] *See, e.g.,* Interim Report, Att. A, FT-5. Worse still, instead of marking the issue "open" due to the need to analyze further the reason for a manual rather than electronic return message, Telcordia "closes" the issue based on the CLEC's resubmission of the particular LSR with a correction. Telcordia's approach -- focusing too heavily on whether a particular test order ultimately completed -- increases the risk that underlying systemic problems have been missed in the analysis. Unless Telcordia was provided with information that the problem was systemic, Telcordia apparently assumed it to be isolated.[13] AT&T believes Telcordia should have been more curious as to underlying cause and more open to the possibility that errors, whether or not data specific, might reflect systemic problems. For example, while Telcordia reports that SWBT accidentally disconnected an AT&T customer account (Interim Report, Att. A, FT16), the problem is "closed" without any explanation of what methods and procedures have been recommended to prevent or minimize such an occurrence.[14] In other

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[12] Although Telcordia admitted during its presentation last week that CLEC sytems and processes were not the subject of the testing, Telcordia's chart over-represented CLEC order generation errors, ignoring how SWBT responded to the submission. Except as a break out of the number of LSRs rejected, the occurrence of any error caused by CLEC order entry should have been ignored in the test results, unless the error resulted from lack of clarity in SWBT's documentation.

[13] "If there was no information to the effect that it was a systemic issue, then we would, I think close it. If there was information from somebody that it was, in fact, a systemic issue and that we should be investigating it, then that should show up in the description of the problem or the root cause." Workshop, Tr. at 139 (7/22/99) (Ryder). AT&T, perhaps naively, but certainly justifiably, understood that inclusion of an issue on its daily test logs would create appropriate curiosity at Telcordia's end as to whether the problem was isolated or systemic.

[14] Instead, Telcordia responds that "it was accidentally disconnected or treated accidentally by the ILEC, we felt that -- you know, that's human error." Telephone Conference, Tr. at 404 (7/27/99) (J. Nix) (*The cited transcript is of a phone conference from which SWBT was excluded by the ALJ due to SWBT's unwillingness to share its testing issue log. This explanation is added to comply with Judge Siegel's direction that SWBT's lack of participation be noted when citing the transcript.)

instances, Telcordia notes that a problem has been referred to SWBT, but then again marks the issue as "closed" without any statement or validation of its resolution. *Id.* FT-20 (potential discrepancy in Toolbar referred to SWBT Toolbar group).

Telcordia's failure to appreciate the focus of issues emerging in testing is particularly troubling given that AT&T added to the daily issue log provided to Telcordia a column discussing the impact and implications of each issue. *See* Attachment 1, hereto. The end result of Telcordia's misinterpretation of the nature and impact of problem is that issues are designated "closed" that still have no resolution. The Commission should also be concerned that Telcordia does not intend to indicate for each testing issue closed whether validation was based on representations by a test participant versus independent observation, and in at least one instance Telcordia has simply repeated an explanation provided by SWBT, without any clear understanding of what the statement means.[15]

*Conflicting Root Cause Analysis.* On numerous issues Telcordia's root cause analysis does not match AT&T's understanding of the problem, even when the identification of the problem had been communicated directly to AT&T by SWBT.[16] For example, Telcordia reports that a telephone number reservation obtained in pre-order expired by the time the ordering phase of testing was conducted, thus explaining why the order rejected for an unavailable telephone number. Interim Report, Att. A, FT-12. Yet, the telephone number reservation time period had not expired in at least one reported scenario and SWBT communicated to AT&T (with Telcordia

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[15] Telephone Conference, Tr. at 318-19 (L. Feerick), Tr. at 402 (7/27/99) (J. Nix)(*The cited transcript is of a phone conference from which SWBT was excluded by the ALJ due to SWBT's unwillingness to share its testing issue log. This explanation is added to comply with Judge Siegel's direction that SWBT's lack of participation be noted when citing the transcript.)

[16] This problem is not unique to AT&T's UNE-P functionality testing issues. According to MCI, conflicts also appear in Telcordia's description of issues from the UNE-L testing. In fact, the "very first issue" on the UNE-L log is referenced as "manual CLEC input error," and Telcordia admits that explanation is incorrect. "This particular root cause as it is stated here was not what should have been there. . . [A]ll of the significant little idiosyncracies will be clarified." Telephone Conference, Tr. at 326-30 (7/27/99) (M. Hall) (*The cited transcript is of a phone conference from which SWBT was excluded by the ALJ due to SWBT's unwillingness to share its testing issue log. This explanation is added to comply with Judge Siegel's direction that SWBT's lack of participation be noted when citing the transcript.)

monitoring the call) that it was a LASR edit problem at its end that caused the order to reject in error. *See* Att. 1, Issue 28.[17] If Telcordia disputed AT&T's understanding of what happened, it should have presented AT&T with substantiation and an opportunity to respond in advance of issuing the report. It was admitted during the technical conferences that this should have been done but was not done because of time constraints.[18]

*Provisioning Issues.* Telcordia's unwillingness to log any provisioning issues surrounding SWBT's installation of volunteer test lines reveals too narrow a view of what may cripple competition. Customer confusion about who is at fault ultimately will harm the growth of competition. More critically, **Telcordia's failure to investigate loss of dial tone resulting from conversion of customer service during test execution is inexplicable and inexcusable.** Telcordia reports without explanation that 11 percent of volunteers reported loss of dial tone. *Interim Report,* 4-44. Other provisioning issues, including a high percentage of failed feature activations (only 73 percent of feature activation tested okay), apparently are still under review. *Id.* Telcordia states that it will reconsider its determination that loss of dial tone was outside the scope of testing.[19] If any confusion somehow occurred in communicating to Telcordia that it needed to monitor the patients' vital signs during the operation, that misunderstanding should be cleared up immediately.

### C. Telcordia wore blinders, relying too frequently on a "beyond the scope" of the test plan explanation.

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[17] Telephone Conference, Tr. at 399 (L. Hall) (*The cited transcript is of a phone conference from which SWBT was excluded by the ALJ due to SWBT's unwillingness to share its testing issue log. This explanation is added to comply with Judge Siegel's direction that SWBT's lack of participation be noted when citing the transcript.)

[18] *See* Telephone Conference, Tr. at 465-66 (7/27/99) (H. Siegel) (*The cited transcript is of a phone conference from which SWBT was excluded by the ALJ due to SWBT's unwillingness to share its testing issue log. This explanation is added to comply with Judge Siegel's direction that SWBT's lack of participation be noted when citing the transcript.)

[19] Telephone Conference, Tr. at 436 (7/27/99) (J. Nix) (*The cited transcript is of a phone conference from which SWBT was excluded by the ALJ due to SWBT's unwillingness to share its testing issue log. This explanation is added to comply with Judge Siegel's direction that SWBT's lack of participation be noted when citing the transcript.)

Telcordia adopted too restrictive a view of what should be observed during test execution. Although software change control, for example, was excluded from the test plan (over AT&T's objection), **Telcordia should have at least recorded and commented on the problems that arose during the testing when SWBT's introduced its May 1, 1999 EDI software release.** As the Commission is aware, AT&T sought intervention to prevent SWBT from implementing the May 1 release as scheduled because pre-release testing was incomplete and revealed unresolved problems. Despite SWBT assurances that the problems had been resolved, issues uncovered in pre-release testing continued to be exhibited after implementation. One problem took an additional 30 days to resolve. Although ranking as a relatively minor release, the implementation brought substantial havoc, particularly in SWBT's ability to return timely and accurate electronic records. Problems appeared even in processes that seemed unlikely candidates for impact given the scope of the release. Although a prediction has been made that the Final Report will include a discussion of the May 1 release, this was a significant event in the life of the test and should have been addressed in detail in Telcordia's Interim Report.

Another critical area that Telcordia did not investigate because it was determined to be "out of scope" was the quality and accuracy of SWBT's EDI documentation and Local Service Order Requirements (LSOR). Instead of publishing its own EDI documentation, SWBT refers CLECs to industry EDI interface guidelines and to a series of SWBT accessible letters that have come out over time and have been posted on the website. This collection of letters is intended to alert CLECs to differences between the industry published guidelines and SWBT's own specifications. **Telcordia "did not validate any EDI documentation" or the merits of SWBT's chosen method of communicating system specification.** (In fact, Telcordia erroneously believed that SWBT publishes its own EDI gateway documentation, including mapping specifications. Tr. at 217 (7/26/99) (J. Nix).)

From personal experience, based on more than two years of negotiating, testing, coding and re-coding, simulating, and mapping and re-mapping, AT&T can testify that SWBT's publication of a comprehensive set of EDI specifications peculiar to SWBT's EDI interface

would have been helpful to AT&T and may be essential for CLECs with less patience or fewer resources. The narrowness of the Master Test Plan, however, sheltered Telcordia from having to address the issue.

Telcordia also has not performed a review to determine whether SWBT's upcoming revised LSOR accurately captures and de-codes all error messages a CLEC may receive back from SWBT.[20] Because the absence of adequate error codes has been an issue in the past, and appeared again in testing, Telcordia's charge should have been expanded to cover these critical documentation issues. The one area of documentation review that Telcordia acknowledges was included in the scope of testing -- an analysis of the documentation associated with the December 19, 1998 EDI release -- is still under review by Telcordia. Phone Conference, Tr. at 210 (7/26/99)(J. Nix). Telcordia also has not commented yet on the completeness and accuracy of SWBT publications on the subject of whether supplements (submissions to request changes to customer orders prior to order completion) do or do not flow through electronically.[21]

Another significant "blind spot" in the testing has been Telcordia's unwillingness to consider results from CLEC commercial activity being conducted contemporaneously with the testing. This Commission recognized early on the disadvantages of relying on testing alone rather than live orders.

> *Commissioner Walsh:* I don't think it's [third-party testing] the solution of choice. I think that getting to a point where the CLECs

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[20] Telephone Conference, Tr. at 403 (7/27/99) (J. Nix) (*The cited transcript is of a phone conference from which SWBT was excluded by the ALJ due to SWBT's unwillingness to share its testing issue log. This explanation is added to comply with Judge Siegel's direction that SWBT's lack of participation be noted when citing the transcript.)

[21] Dalton: And my question is, with the documentation and the list that Telcordia reviewed, can they draw a conclusion as to what will versus what will not flow-through on supplemental orders?

Siegel: If the answer to it is, that you think you can but you haven't done that yet, then just let us know that.

Unidentified Telcordia Speaker: That is exactly what I'm going to tell you. We have not done that yet.

Telephone Conference, Tr. at 25 (7/26/99).

> have enough confidence in this system to step up to the plate and come into this market and do traffic at volume is a better answer because I think when you have third-party testing it still is just a promise of, yes, it works. I think that is something we might consider, but it wouldn't be my first choice.
>
> *Chairman Wood:* It's certainly not mine either.

PUC Open Meeting, Tr. at 42 (9/23/98). "And I think, as you and I have discussed before, we want -- we would prefer there to be actual road testing for people who are using these systems -- these computer systems -- these ordering provisioning and billing systems in a commercial marketplace." PUC Open Meeting, Tr. at 13, (Comm. Walsh) (11/5/98).

Fortunately, the Commission's first choice -- a "road test" of the ramp up of commercial volumes -- is now available. Unfortunately, **Telcordia has so far failed to consult what was happening in the real world as a sanity check on its own findings.** AT&T appreciates that Telcordia is not in a position to validate what occurs outside the test environment (Workshop, Tr. at 90, 7/22/99, S. Khurana), but experiences from the commercial production environment should inform the testing process and motivate it to examine issues not within the four corners of the Master Test Plan.

### D. Telcordia's Interim Report assumes parity without proving parity, and gives inadequate consideration to manual processes impacting CLEC orders.

Telcordia's Interim Report makes broad representations regarding SWBT's performance of manual processes and their impact on CLEC orders. Yet, Telcordia acknowledges that the review of manual processes is still to come, that comprehensive review of comparable manual and electronic processes in SWBT's retail environment has not been performed, and that an analysis of the unique and disproportionate impact of back-end processes on CLEC orders has not taken place. Telcordia ended up defending one particularly broad parity statement concerning manual support functions (Interim Report, 4.4.2.1.6.6 at 4-30) by agreeing that it probably referred only to processing before the order reaches SORD. Telephone Conference, Tr. at 256 (7/26/99)(S. Khurana). The attempted explanation, however, was confusing in light of

statements made earlier the same day that CLEC orders are subject to additional edits and processes prior to reaching SORD. "[T]he difference being that with the CLEC business, you have, on a lot of data coming in through the LEX EDI interface, some of it MOGable, some falling out. . . . And with respect to the CLEC business, there's additional edits that would not exist on the retail side in terms of the LASR edits, you know MOG edits and SORD edits." Phone Conference, Tr. at 184 (7/26/99) (A. Stalgaitis).

Telcordia is under the misperception that testing could assume the adequate functioning of SWBT's back-end processes because of their maturity. *See, e.g.* Interim Report, ES-14 ("The CT did not address the downstream provisioning systems in which CLEC-initiated traffic and SWB-initiated traffic are combined, which are considered mature and thus not in need of test."). This Commision's Order No. 25 provided that: "SWBT shall demonstrate that its back-end systems are operationally ready, to assure performance parity between CLECs and SWBT's retail operations for POTS (plain old telephone service) order completion, FOCs, installation intervals, trouble reports, design services, billing accuracy, or billing timeliness." *Commission OSS Specific Recommendation No. 29* (6/1/98). And the Commission's Final Staff Status Report explicitly identifies the back-end systems and processes for inclusion in Docket 20000 testing. "Third-party testing of SWBT's electronic OSS systems will take place in Project No. 20000. This recommendation will be met when third-party testing verifies that SWBT's systems provide parity flow-through of commercial volume without the necessity of manual intervention and billing problems, to the extent they impede a new entrant's ability to do business, have been addressed." *Final Staff Status Recommendation* at 212 (11/18/98).[22]

Rather than heed the charge to analyze the extent and impact of manual processes, Telcordia over subscribed to SWBT's narrow view of a "black box type test" limited to looking at "inputs that come in" and "outputs coming out" charted against performance

[22] In its numerous filings in Dockets 16251 and 20000, AT&T previously has reported its concerns that the Master Test Plan should and does not adequately address each of those Commission OSS Specific Recommendations from Order No. 25 that were expected to be reviewed in OSS testing.

measures. Tr. at 159 (7/26/99) (L. Ham). **Because the Master Test Plan includes absolutely *no volume testing of end-to-end provisioning, maintenance and repair, database updating, or billing*, depending on resulting test data to tell the story of potential problems that may only be apparent with increased volumes is dangerous.**[23] The fallacy of relying on the functionality test and the "maturity" of SWBT's systems has already been demonstrated. Absent a realistic volume test of SWBT's back-end processes and systems, Telcordia is not in a position to certify that those systems will function under stress, or that the incidence of manual processing of CLEC orders is no higher than in SWBT's retail operations. Given the continuing concerns about manual processing that is peculiar to CLEC conversion orders, a great deal more needs to be investigated. Telcordia certainly should have performed an audit of all back-end automated and non-automated processes to determine the susceptibility of CLEC orders to the acknowledged risks that manual processes introduce.

On manual processes that impact CLEC orders, the force models SWBT uses to predict and meet staffing needs must be based on assumptions about the likely occurrence of manual processing. Manual processing will occur whenever, for example, CLECs send orders that are not MOG-eligible or when MOG-eligible electronic orders "fall out" to manual processing for any reason. In either case, a SWBT representative will need to manually key in and create service orders within the SORD system, thus introducing opportunity for error and delay. Telcordia optimistically reports that the majority of CLEC orders are expected to be MOG-eligible (Master Test Plan, 4.4, n.7), yet does not report or claim to know what percentage of MOG-eligible orders actually MOG without manual intervention.

Concern for the known and unknown risks of manual processing is justified. AT&T

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[23] In addition, reliance on performance measures data alone, even of larger sample sizes, is problematic given the "proving in" that is necessary to determine whether the collection of measures and statement of rules adequately capture performance concerns. For example, SWBT's recent explanation of time stamping for receipt and return of EDI messages raised serious issues as to whether SWBT is insulating itself from being charged with delays associated with its own queuing processes. When asked whether Telcordia has looked at "whether the size and the performance of the queue is reasonable," Telcordia's spokesperson on performance measurements answered, "I have not. One of our other experts has looked at that somewhat." Workshop, Tr. at 95-96 (7/22/99) (Linnell).

learned the hard way that SWBT's AIN implementation did not work as designed, resulting in SWBT's reliance on previously undisclosed manual intervention on at least some types of conversion orders. Problems in the coordination of the back-end "D" "N" and "C" orders associated with a UNE conversion order were understood by AT&T to have been fixed by SWBT with implementation of an automated solution, but apparently manual work continues to be required. As a result, initial orders transitioning AT&T resale customers to UNE-P caused 24 out of 28 customers to lose outbound calling capability, some for several days. Telcordia's report contains no discussion of the problem, even though AT&T followed Commission Staff's direction to provide Telcordia with identification of problems encountered in its own separate testing and production orders.

Additionally, in order **to permit CLECs to enter maintenance reports during the time period between service completion and the back-end posting to billing systems, SWBT representatives will need to manually create "mini-records" for CLEC customer accounts.** Otherwise, SWBT's systems will not recognize the account as belonging to the CLEC, thus preventing the CLEC from submitting trouble reports through Trouble Administration and from accessing mechanized loop testing (MLT). Obviously, the work force requirements associated with this account creation task will depend on the likely occurrence of trouble reports at or near the time of provisioning -- versus maintenance issues expected after the converted account has been established long enough to appear in SWBT's back-end systems as belonging to the CLEC. (SWBT's response that the models include historical data is not helpful given the absence of historical competitive volumes. Telephone Conference Tr. at 62 (7/26/99) (L. Ham).) Telcordia's representation that examining the length of time required for posting CLEC LSRs is deemed "out of scope" means the test may conclude without adequate parity comparisons having been executed. Phone Conference, Tr. at 166 (7/26/99) (J. Nix). Because testing revealed that delays in posting also prevent a CLEC from submitting change orders (e.g. adding a calling feature) on an account,[24] even though a completion notice has issued, the timing associated with

[24] Telephone Conference, Tr. at 423 (7/27/99) (J. Nix) (acknowledging that further investigation will be done on

back-end system and database posting deserves additional attention.

Telcordia recently stated that it would need more information from SWBT in order to address whether the underlying assumptions in the work force model account for the volume of trouble tickets that might require manual processing. *See* Telephone Conference, Tr. 63-64 (A. Stalgaitis) (7/26/99). Such statements do not inspire confidence that SWBT has made adequate disclosure of what happens to a CLEC order once it makes its way safely over the EDI gateway. More needs to be understood about the delay in posting problems. Even if delays in posting are experienced on SWBT's retail side, Telcordia should report on the relative length of those delays compared with lag time experienced in the posting of UNE conversion orders.

"We are not looking at tracking the orders through the back end Southwestern Bell system by system by system. So if there are – anything that is beyond SORD that – I don't know – has six OSSs or something, then it goes through. I don't know I'm guessing. Maybe it just goes to one. . . . We are not tracking that." Workshop, Tr. at 61 (7/22/99) (S. Khurana). **AT&T was hoping for more than guesses about what happens in the back-end systems and processes to impact the timeliness and accuracy of provisioning and posting for CLEC customer orders.** "Describing how everything actually proceeds through every system and everything was not something that was described as being in scope." Workshop, Tr. at 149 (7/26/99) (L. Feerick). "The short answer is, will there be a flow chart explanation? That's your more general question. I think the answer is 'No.'" Workshop, Tr. at 161 (7/26/99) (H. Siegel).

The insight AT&T believed Telcordia was to contribute on issues of parity should have been based on actual observation of the processing of SWBT retail orders. Nothing AT&T has learned to date indicates that Telcordia had open or ready access to SWBT retail operation processes or performance. **The now overly familiar SWBT mantra "and it's just the same in our retail operation" should have been challenged by Telcordia with requests for**

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the inability to submit a change order) (*The cited transcript is of a phone conference from which SWBT was excluded by the ALJ due to SWBT's unwillingness to share its testing issue log. This explanation is added to comply with Judge Siegel's direction that SWBT's lack of participation be noted when citing the transcript.)

**independent observation.** Nothing suggests that has happened or will happen. SWBT erected an impenetrable wall in Docket 16251, claiming that retail data to prove or disprove parity is proprietary. Telcordia has not made it beyond the barrier.

Even on the wholesale side, SWBT has not provided Telcordia with necessary access to back-end systems and processes. The delay in posting of CLEC customer records to billing has been a subject of ongoing concern, both because of double billing potential and because delayed posting prevents the electronic submission of maintenance reports and change orders. Yet, Telcordia claims not to have received from SWBT its weekly process error reports showing which test and production orders "errored" and "posted" on particular days. Tr. at 180 (Stalgaitis, A.)

Additional areas where relative impact on CLEC orders has not been addressed include "timing out" on the DataGate application, manual entry problems resulting in the dropping of customer requested due date information from SWBT internally created service orders and its impact on performance measurement reporting (Telcordia is still investigating the impact of the missing data in commercial environments),[25] and the occurrence of zero value response times for pre-order during testing. Each of these subjects was identified for Telcordia in conferences following release of the Interim Report.

### E. Telcordia's Interim Report of problems with UNE-L is bolstered by AT&T's limited commercial experience thus far. The scope of re-testing should be broad enough to address issues being encountered with UNE-L commercial orders.

Early analysis of initial data reported on AT&T's UNE-L orders for small businesses raises concerns beyond those reported in Telcordia's Interim Report. **In excess of 21 percent of AT&T's UNE-L orders in June 1999 for Texas experienced SWBT-caused provisioning errors.** Customers suffered unanticipated disruption of service in approximately 17 percent of orders in the month of June, with out-of-service times on orders covered by trouble tickets lasting

[25] Telephone Conference, Tr. at 173-74 (7/26/99) (A. Stalgaitis).

on average more than 18 hours.

AT&T requests that these issues be addressed in UNE-L re-testing and that recommendations be made as to the adequacy of coordinated and non-coordinated "hot cut" performance measures, including necessary additions and, if appropriate, subtractions from existing measures, as well as any proposed modifications to the associated business rules.

### F. Other Inaccuracies in the Interim Report and gaps in back-up documentation raise additional concerns.

AT&T has communicated many of its concerns relating to accuracy of statements in the Interim Report through phone conferences with Telcordia with PUC participation. For example, the report as written may mislead a reader regarding the extent of testing of LIDB processes. **The LIDB record establishment and claiming process was not evaluated and tested, despite CLEC-expressed parity concerns about the current processes.** "[I]t was out of scope to actually do the process, validating the upload to the LIDB database." Telephone Conference, Tr. at 36 (7/26/99) (J. Nix).

Reference is made to additional testing of the ALPSS/LIRA release, which should provide CLECs with access to directory records to determine the presence and accuracy of customer records and produce pre-publication white page listing records for verification. The Interim Report erroneously contains a reference to a CLEC having provided Telcordia with a feed from the ALPSS/LIRA database (Interim Report, 4-69), when the data was actually received from SWBT. Phone Conference, Tr. at 220 (7/26/99) (J. Nix). **When asked whether testing would include "CLECs' ability to gain realtime access to ALPSS/LIRA database to determine present accuracy of customer directory records," Telcordia responded that it did not believe any such review was within the scope of testing.** Telephone Conference, Tr. at 166 (7/26/99)(J. Nix). Even with the investigation Telcordia completed to date, **a 13 percent error rate is reported for the appearance of directory information in the ALPSS/LIRA database, but no root cause analysis has been completed.** *Id.* at 219.

While Telcordia represents that testing participants agreed to monitoring guidelines,

AT&T has no recollection of such guidelines even having been shared with AT&T, and MCI reports that it expressly objected to UNE-L monitoring guidelines. And, as AT&T has complained before with reference to similar misstatements in versions of the Master Test Plan, characterization of the capacity test as an "agreed upon process" (Interim Report, ES-14) has been and remains a far cry from reality.

AT&T is limited in its ability to comment on the accuracy of Telcordia's presentation of test data because the order-by-order (PON-by-PON) attachment is missing essential detail, including the root cause description of noted events. The PON-by-PON for the UNE-P functionality test at this stage also does not appear to have time stamps, contains missing or incomplete data for some versions of orders, and reflects inaccurate data for some versions that are included. AT&T understands that a revised PON-by-PON is being prepared.

## III. PERFORMANCE MEASUREMENT VALIDATION AND HISTORICAL DATA

### A. Telcordia has not properly validated performance measure (PM) processes, nor is its review of historical and test data adequate. In addition, those results that have been reported do not show adequate compliance.

The participants are withholding detailed comments on the performance measurement aspects of the Interim Report to the extent such comments might address the now withdrawn Attachment J to the Interim Report, pursuant to Staff instruction, pending resolution of SWBT's objection that proprietary information was included in Attachment J. Attachment J contains Telcordia's description of its review of the data collection process used by SWBT in providing performance measurements.[26] A session to allow participants to address questions to Telcordia

[26] Telephone Conference, Tr. at 90 (7/26/99). Evaluating the scope and quality of Telcordia's activities in reviewing SWBT performance data collection – the subject of Attachment J – is essential to reaching conclusions about any portions of the Interim Report that address performance measures, because the data collection review goes directly to the reliability of SWBT's performance data. Accordingly, any comments on the Interim Report's treatment of performance measures at this juncture must be general, in keeping with the Administrative Law Judge's directive to refrain from further review and comment on Attachment J. AT&T's comments here are based on the statements related to performance measures in other portions of the Interim Report and on Telcordia's answers to the general questions on performance measures that were permitted after SWBT raised its confidentiality objections to Attachment J during the July 26, 1999 workshop. **Until the confidentiality issue raised by SWBT has been resolved, and all participants are permitted to make substantive comments on Telcordia's review of SWBT performance data collection, the Commission will**

in order to prepare comments on Attachment J has been postponed pending circulation of a revised Attachment J.

Even without reference to Attachment J, however, two points about Telcordia's review of performance measures are clear. First, Telcordia has omitted from its scope of activity a critical step that should be basic to any such auditing effort -- namely, verifying that the data collection process accurately and completely collects the data necessary to calculate the PM results in the manner intended by the Commission. This fact alone will foreclose reliance on SWBT performance data for determining checklist compliance or any other important purpose. Second, even taking the Interim Report at face value, it confirms that the three months of performance data examined by Telcordia will fail the statistical test established by this Commission in the Memorandum of Understanding. *See* MOU at 38 (Attachment B, section VII.B). The data collection process issues that Telcordia has raised, and the results of its historical data evaluation, each independently will require the conclusion that SWBT's March-May 1999 performance data cannot meet this test. **In short, the Interim Report makes clear that SWBT performance data does not provide a basis for demonstrating checklist compliance at this time.**

Telcordia's treatment of SWBT performance measures falls into the following four categories: (1) PM Process Review (2) Historical Evaluation (3) Functionality Test Evaluation, and (4) Capacity Test Evaluation. The latter two categories represent applications of SWBT performance measures, not validation or review of the reliability and accuracy of SWBT performance measurement. With the understanding from the Administrative Law Judge that full comments on performance measures are not expected at this time, in order to preserve the confidentiality issues that SWBT has raised regarding Attachment J, AT&T offers these preliminary, general comments on Telcordia's PM Process Review and Historical Evaluation.

### 1. PM Process Review: Telcordia's Reported Activities Will Not Validate That SWBT Performance Data Is Accurate Or Reliable

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**have no basis for reaching any conclusion about the reliability of SWBT's reported performance data.**

This Commission properly has insisted that, before SWBT could receive an affirmative recommendation on its application for long distance authority, SWBT would have to produce three months of performance data showing compliance with its obligation to provide nondiscriminatory wholesale support to CLECs and to meet benchmarks that will afford CLECs a meaningful opportunity to compete. *E.g.,* Order No. 25, Performance Measurement Recommendation No. 8, OSS Recommendation No. 17. The Commission has looked to a time when SWBT performance data could serve as an objective "report card" that will identify satisfactory and unsatisfactory performance and avoid subjective and anecdotal squabbling.

Independent validation that SWBT's PM processes, data and data retention associated with pre-ordering, ordering, provisioning, maintenance and billing are being executed as documented and yielding accurate PM reporting is a pre-requisite to placing any weight to the PM results that SWBT reports. AT&T has long been a proponent of a fully comprehensive readiness audit performed by an independent and neutral party to help assure that the performance measurement results upon which the Commission will make its decisions correctly reflect what is occurring in the marketplace. After AT&T and others raised the need for independent validation of SWBT performance data,[27] the Commission clarified that the three months of satisfactory historical performance data to be provided by SWBT would have to be "validated data."[28] The Commission added the task of performance measurement review to Telcordia's scope of work.[29]

Unfortunately, Telcordia chose to undertake this add-on task without any meaningful transition with the CLEC working group from Project No. 16251 that represents an essential part of the institutional knowledge regarding these performance measures. CLECs' request to

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[27] *See* AT&T's Letter to ALJ Regarding Handout Presented by AT&T at the Collaborative Process Work Session on Performance Measures on 10/6/98 (10/8/98); AT&T's Comments in Support of Performance Data Review Proposed at 10/6/98 Work Session (10/20/98); Michael Pfau FSR Aff. (12/10/98).

[28] PUC Project No. 16251, Tr. 2985-88 (12/21/98); *see also* MOU at 38 (Attachment B, section VII.A) (requiring SWBT to provide, 20 days prior to filing with the FCC, three months of "validated data").

[29] PUC Project No. 16251, Tr. 2985-88 (12/21/98).

participate in defining the scope of Telcordia's performance measure work was effectively rejected, despite that fact that this work would require Telcordia to judge whether the processes and practices actually put into place by SWBT matched a complex set of performance measures and business rules that CLECs had played an extensive role in defining and that continued to be in flux. When AT&T raised serious concerns about the reliability of SWBT performance data and the scope of Telcordia's activity[30] -- growing out of retroactive revisions to the data SWBT was reporting to AT&T in Texas, out of errors and discrepancies in SWBT data reporting acknowledged by SWBT in Missouri 271 proceedings, and out of questions raised by the Missouri Commission about whether Telcordia's activity would actually validate the accuracy of the numbers going into SWBT performance data -- AT&T was told to defer its concerns until after the issuance of the Interim Report, when CLECs would have opportunity for comment.

The Interim Report confirms the predictable results of Telcordia having proceeded with this task as an add-on, despite no familiarity with the measures or business rules, little time, and the effective removal from the dialogue of those parties who represented the CLEC viewpoint throughout the development of the measures and business rules. The evaluations that Telcordia has performed thus far, as reflected in the Interim Report, are lacking in many respects. Basic errors were made. For example, Telcordia's "validation" of historical data was performed on the wrong set of data. The MOU requires SWBT to present three months of validated data, evidencing satisfactory performance for disaggregated measurements where the sample size is 10 or greater; other provisions of the MOU call for permutation analysis on sample sizes below 10.[31] Telcordia limited its review to sample sizes of 30 or greater. Interim Report at 7-18.[32] As a

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[30] PUC Project No. 16251, AT&T Letter to ALJ Regarding Rectroactive Changes to Performance Data and Other Validation Concerns (5/11/99).

[31] MOU at 38 (Attachment B, sections VII.A, VII.B). Staff's recommendation against SWBT's preferred minimum of 30 data points, which is what Telcordia used, had been evident at least since the time of the November 1998 Final Staff Status Report.

[32] The SMEs whom Telcordia had participate in the July 26, 1999 Q&Q session to address CLEC questions on the Interim Report were not even aware that the Commission had provided for using the modified z-test down to sample sizes of 10 or more, rather than 30. Telephone Conference, Tr. at 40 (7/26/99).

result, Telcordia will have to recalculate its historical validation results, and the "guess" of the Administrative Law Judge is that this update "won't be provided prior to the final report." Phone Conference, Tr. at 42 (7/26/99). Similarly, Telcordia based its historical data review on version 1.3 of the business rules, despite the fact that SWBT released version 1.4 on May 4, 1999 and the current version, 1.5, on May 17, 1999 (certain additional changes were incorporated in the statement of version 1.5 transmitted by Staff to the Commission under cover of its June 2, 1999 memo).[33] Again, Telcordia now will have to reconsider its historical process review to account for changes in the business rules reflected in version 1.5.[34] At best, Telcordia's efforts may be characterized as an introductory probe into SWBT's performance measurements results reporting process.

Telcordia also omitted steps required by basic good auditing practices. A key deficiency of the Telcordia study renders its "process review" incomplete, and undercuts its historical data evaluation. In conducting its "process review", Telcordia did little or no test case validation to confirm the accuracy of the raw data being collected by SWBT as inputs to the performance measures, but relied principally instead on interviews with SWBT and review of documentation.[35] Basic auditing practice requires a reasonable quantity of test case validation in order to reach meaningful conclusions about the accuracy and reliability of the performance

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[33] Telephone Conference, Tr. at 108-09 (7/26/99).

[34] *Id.* at 109.

[35] *See, e.g.,* Telephone Conference, Tr. at 107-08 (7/26/99) ("We looked at the process for gathering the data. And for a small number of the performance measures in the process of doing the performance or the process review, we looked at the procedures and looked at some of the actual data during the months.") (Feerick); 115 ("during the process review, it's not that we followed any one PM form end-to-end, but on a basis selected by Telcordia when we interviewed the subject matter experts in Southwestern, we would follow specific records in different systems.") (Cohen); 119-20 (stating that Telcordia looked at "about half a dozen or so" measures on an end-to-end basis, but describing even that review as no more than "spot checks": "There were two cases in which we followed up, one simply because – one or two that I thought was appropriate, to see some samples of records. Secondly, in talking to a subject matter expert, what they told us appeared to disagree from what we read in the Business Rules. We followed further into spot checks. Spot checks included not just looking at data records but also looking at source code.") It will not be possible to go into much more detailed discussion of the extent of independent verification sampling, or lack of it, done by Telcordia until the confidentiality dispute concerning Attachment J has been resolved. Suffice it say that the Interim Report, absent reference to Attachment J, fails to document that such sampling was done to any significant degree.

measurements Telcordia was assigned to review. Having omitted this step from its process review, Telcordia proceeded to its historical evaluation, where Telcordia accepted without validation that the three months of PM data that SWBT provided to Telcordia for calculation verification was collected in a manner consistent with the PM processes reviewed by Telcordia.[36] Thus, **Telcordia's analysis side-steps a crucial issue: whether the data collection infrastructure accurately and completely collects the data necessary to calculate the PM results in the manner intended by the Commission.**

This failing is particularly disturbing in that Telcordia also concluded in its "process review" that SWBT did not follow the processes defined in the Business Rules some 10% of the time (ES-15), and Telcordia found **mismatches between the documentation of SWBT's implementation versus the processes actually employed in the case of 45% of the performance measures** (ES-15). Furthermore, Telcordia has not done any "impact analysis to determine what the impact [of these discrepancies] would be on the calculation." Telephone Conference, Tr. at 123 (7/26/99).

Given the apparent implementation inaccuracies in the post data collection stage, clearly the "assumption" of accurate data, while a convenient simplifying assumption, is unwarranted, either for purposes of the process review or the historical evaluation. No conclusions can be drawn that a process is working as intended when little to no testwork and/or observations examined the completeness and accuracy of the raw data feeding the computational process. It becomes even more questionable when the documentation upon which the performance measurement system is premised was reviewed and found to have a significant number of

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[36] The following is Telcordia's statement of what was done during the Historical Data Analysis :

> Telcordia did not independently compute SWB's PMs as part of its validation process. No raw data for the specified months were provided for all measures. Rather, SWB provided processed data and Telcordia ascertained whether or not the processing was carried out correctly. Telcordia did however, randomly sample data to gather some evidence as to the reliability of the "processed data.
>
> Interim Report at 7-17; *see also* ES-15..

inconsistencies as noted above.[37]

Telcordia should be directed to perform a meaningful audit of the accuracy of the data that is being collected and reported by SWBT, at least for some reasonable subset of measures (e.g., Tier 2 measures). This requirement should have been evident in the initial assignment to validate SWBT's performance data collection, analysis, and reporting. The need for this type of testing to verify the accuracy of raw data was noted in AT&T's collaborative process submittals on this subject, and it surely would have been the subject of vigorous discussion during the scoping of Telcordia's work, if CLEC input had been permitted. The need for such testing is no less critical now as a prerequisite to relying on self-reported data as a basis for assessing checklist compliance. Telcordia also should be required to include in its Final Report a detailed account and documentation of all verification sampling that has been done on SWBT's performance data. Certainly a general assertion that "spot checks" were done on half a dozen measures where Telcordia "thought" it was "appropriate" is no basis for concluding that the data going into the SWBT performance measures is accurate.

At this point no conclusions can be drawn regarding performance because no one knows whether the data relating to all potential experiences have been accurately gathered and input to the computational process. The performance measurement processes must be compliant from end-to-end for the results to carry any weight. The result of converting the documentation to computer code for purposes of raw data capture, the actual data collection procedures and data storage provisions all need to accurately represent the intention of the Commission as embodied in approved documentation (e.g. the Business Rules and Memorandum of Understanding) and that no self-serving interpretations or bias have been institutionalized. Telcordia representatives

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[37] While somewhat an oversimplification, the current Telcordia results – taken without any critical examination – indicate a 90% probability of accurate business rule implementation, a 55% probability of compliance with documentation, and an 87% probability of calculation accuracy (based on the conclusion in the Historical Data Evaluation that 13% of SWBT's historical performance measure calculations were invalid, i.e., incorrectly computed). Thus the probability of the post data collection process being completely accurate is less than 50-50 (.9*.55*.87=.43). If the unverified data collection process has an equal probability of being both accurate and complete, then the Commission is faced with the prospect that there is approximately a 1-in-5 chance that the performance results are reliable.

acknowledged that no end-to-end process was fully examined and that test case validations conducted were far from exhaustive, as noted above. The analysis performed thus far falls far short of one of the most fundamental validation requirements – that the input to the PM calculation is accurate.[38]

Notwithstanding this basic flaw, Telcordia's process review does reveal a significant range of problems with SWBT's conformity to the performance measures and business rules established by the Commission.[39] Again, comments on the accuracy or adequacy of Telcordia's process review for individual measures will have to await the resolution of Attachment J's confidentiality. What can be seen, however, from review of the list of issues found in Attachment A is that significant process issues remain unresolved, even from Telcordia's viewpoint. The process issues identified by Telcordia as "open" or "pending" affect 10 Tier 2 measures (5 of these issues are characterized as "major") and 18 Tier 1 measures (10 "major", 1 "critical"). In addition, two "major" pending issues cut across the measures as a whole – a "general lack of documentation for testing of computer programs and processes for the calculation of PMs" and inconsistency between SWBT's internal version and multiple external versions of the performance measures. Attachment A, PM-145 and PM-146.

The PM Process Review, as described in the Interim Report, provides no basis for

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[38] After the exposure of numerous errors and discrepancies in SWBT performance data reports during the recent 271 hearing in Missouri, Commissioner Crumpton emphasized the need for validation of the performance data itself, not merely the performance measurement process: "we want to look at what data went into the calculations and where that data originated so that we can go back and compare." Missouri 271 Tr. 2202-03 (March 10, 1999). The Missouri Commission has called for a Staff report regarding the steps needed to arrive at performance measures and data that can be used to assess checklist compliance in that state, and Staff very recently has restated its recommendation in favor of "independent 3rd party validation of specific data as well as the data collection process. In making that recommendation, the Missouri Staff also has observed that "Telcordia is conducting validation on the data collection process, rather than on specific data." Missouri Staff Report, Performance Measures Matrix at 9 (July 16, 1999).

[39] AT&T notes here that it objects to numerous aspects of the performance measures and business rules that the Commission apparently plans to approve as part of the Proposed Interconnection Agreement, such as the degree of reliance on benchmarks rather than parity comparisons for performance standards. With those objections reserved, AT&T's comments here are confined to the scope of Telcordia's work, which takes the Commission-established measures and business rules as a given. Indeed, Telcordia itself has stated that it regards alterations to the business rules as beyond the scope of its assignment. Workshop, Tr. at 98 (7/22/99).

concluding that SWBT's data collection and reporting processes have been validated, much less the actual data produced from those processes.

### 2. Historical Data Evaluation: Even with the unwarranted assumption that SWBT data is accurate, the Interim Report confirms that SWBT fails the 3-month test.

For the reasons stated above, Telcordia's historical data evaluation (or anyone else's) will not be meaningful until the accuracy of the data being input into SWBT's performance measurement systems has been verified. But taking a look past that critical omission, the Interim Report reveals that SWBT cannot pass the quantitative test established by the Commission in the MOU – 90% of the validated Tier-2 performance measurement results (sample size 10 or greater) for each reported measurement per month aggregated for all CLECs should demonstrate parity or benchmark compliance for 2 of 3 months.[40]

Telcordia itself does not offer any analysis in the Interim Report of whether the March through May data that it reviewed will pass the test set by the Commission. What Telcordia did in the historical evaluation was to independently calculate z-scores from data provided by SWBT (similar to the exercise undertaken by Staff earlier this year). That evaluation resulted in a mismatch between SWBT's calculation and Telcordia's in 13 percent of the cases,[41] which should itself preclude any conclusion that SWBT could have satisfied 90% of the measures.

Telcordia's historical evaluation is presented in a matrix in Section 7 of the Interim Report, and detailed in Attachment K. Cursory review of that information shows that **March-May 1999 SWBT performance data, as analyzed to date by Telcordia, will not support a**

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[40] MOU at 38 (Attachment B, section VII.B). Chairman Wood also has clarified that no single measure should be out of compliance more than one time during the three-month period. Open Meeting, Tr. at 48 (4/29/99). When AT&T raised concerns that this statistical test is not sufficient to demonstrate checklist compliance, the Commission emphasized that this is simply one quantitative test that SWBT must pass, and was not intended to foreclose other, qualitative concerns arising out of SWBT performance data. The preliminary comments here do not go beyond noting that the Interim Report itself suggests failure of the quantitative test.

[41] Interim Report at ES-16 (noting disparate results in 228 of 1742 cases, perhaps due to Telcordia and SWBT using "different versions of changing formulas of the Business Rules," hardly an indicator of a stable, reliable performance measurement system).

**passing grade for SWBT on the Commission's quantitative test.** To begin with, key measures are omitted: Telcordia reports zero activity, or nothing, for these three months for such measures as OSS availability (PM 4), % FOC return within "x" (PM 5), provisioning accuracy (PM 12), resale specials average installation interval (PM 43), and common transport trunk blockage (PM 71). This is in addition to reporting as "NA" all of the measures for LNP, NXX, and bona fide requests. And, as noted earlier, Telcordia incorrectly circumscribed its evaluation to measurements reflecting samples of at least 30 units.

Even within its own restricted scope, however, Telcordia's historical evaluation points to failure. **Telcordia reports that SWBT failed the performance criterion (parity or benchmark) for more than 10% of the Tier 2 measurements in every month from March through May 1999.** Based on Telcordia's matrix, SWBT passed only 80.2% of its Tier 2 measurements in March, 81.8% in April, and 86.0% in May.[42] These conclusions do not take account of the individual measures for which failure is repeated throughout the three-month period. **On a measure that has drawn this Commission's repeated attention, Percent Interconnection Trunk Blockage (PM 70) (Tier 1 High, Tier 2 High), SWBT failed more than half of the measurements in each of the three months.**

Based on the Interim Report, the first three-month period that could even be considered for purposes of the Commission's quantitative test would be June-August 1999. More realistically, to obtain reliable results rather than repeat the controversy over the validity of the data itself, that three-month set of data should be collected following completion of the data

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[42] These results are derived by tallying the pass and fail totals reported by Telcordia for each Tier 2 measurement included in the historical data in the Performance Measures Summary matrix presented in Table 7-1 of the Interim Report. Interim Report at 7-4 through 7-14. According to Telcordia's table, SWBT passed 219 of 273 Tier 2 measurements in March 1999, for a pass rate of 80.2%, 225 of 275 in April 1999 (81.8%), and 234 of 272 in May 1999 (86.0%). AT&T notes that the Telcordia table recorded pass and fail results for pre-order response timeliness (PM 2) based on the benchmarks in place prior to the Commission's July 15, 1999 Open Meeting; Telcordia reports more than 50% failure each month against those benchmarks. AT&T takes exception to the benchmarks that were approved at the July 15 meeting, as being based on little more than adding some margin for error to reported SWBT performance, and for using a benchmark where parity should apply. Time has not permitted recalculation of the results based on the new benchmarks. However, even if pre-order response time measures as reported by Telcordia are excluded from the calculation, SWBT still failed over 10% of the Tier 2 measurements in March and April 1999.

verification activity called for above and the resolution of the process issues identified by Telcordia.

Telcordia's report of performance data for the Functionality Test also point to failure; at a minimum, the data fail to document success. Per the Functionality Test PMs, the following was concluded by Telcordia:

- For the 8 preorder and order PMs, 5 did not have established criteria. Of the remaining 3, 2 met and 1 did not meet the established criteria.
- For the 8 provisioning PMs with sufficient data, 6 met and 2 did not meet the established criteria.
- For the 12 maintenance and repair PMs, 11 did not have sufficient data for a statistically significant analysis, and the results were inconclusive. Telcordia recommends that additional maintenance and repair test scenarios be executed in the retest period. The 1 PM that had sufficient data met the established criteria.[43]

Thus, the conclusion are as follows for the performance measures examined in the functionality test:

- pre-ordering and order measurement criteria compliance : 33% failure rate for measures with established criteria; majority of measures lacking such criteria (i.e., failure to document success for 75% of the measures)
- provisioning compliance: 25% failure rate
- maintenance and repair data adequacy: 91% failure rate (i.e., failure to document satisfactory performance due to lack of data)

Such findings argue strenuously against a Commission finding that it can rely upon current PM data and results provided by SWBT as any measure of checklist compliance.

**3. Observations on Test Data reported against performance measures.**

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[43] Interim Report at ES-17.

Telcordia's Interim Report, as it concerns performance measures, is notable for what it does not discuss. For instance, the study draws no definitive conclusions in regards to SWBT's PM process and results. Expectations must be set forth so that Telcordia provides its assessment (and an explanation of the methodology rational resulting in the assessment) of the following:

- Whether the SWBT PM reporting process is consistent and aligned correctly with the Memorandum of Understanding and the business rules
- Whether the testwork and/or observations made reveal that SWBT has accurately implemented the business rules
- Whether SWBT's PM reporting process is yielding accurate results.

These conclusions must be drawn affirmatively by Telcordia, and withstand scrutiny, before the Commission can place reliance on SWBT's performance data. For now, the Interim Report confirms that no such reliance could be justified.

From the perspective of gaining an initial high-level understanding of the PM processes and systems that are being utilized by SWBT, Telcordia's analysis for the most part serves as an introduction. The analysis performed thus far fails in regards to being a fully planned and executed validation of SWBT's performance measurement systems. The analysis is lacking in several respects as addressed in detail above. Extensive test case validations and observations need to be performed, data retention processes need to be examined, and overall analysis and conclusions need to be addressed affirmatively and in sufficient detail. The interim report fails to address these areas adequately. Telcordia's PM analysis should have an ultimate objective of providing crucial insights regarding SWBT's PM processes so this Commission can determine if it has received accurate and factual evidence necessary to make a reasoned, informed and valid assessment of SWBT's support of CLECs. That objective has not yet been achieved.

## IV. RE-TESTING AND THE DEVELOPMENT OF THE FINAL REPORT

The scope of re-testing is still being defined and AT&T has not yet received a description of the planned UNE-P re-testing. To the extent that Telcordia is using its own incomplete list of issues found in testing to design re-testing, AT&T obviously has concerns that the scope of

further testing will not be comprehensive. An opportunity should be permitted for CLEC test participants to comment on the planned re-testing before its execution. AT&T also requests that the Final Report following re-testing be circulated to the Technical Advisory Group for comment before its presentation to the Commission. If for no other reason, at least inadvertent omissions and errors may be caught before broader circulation occurs. Finally, AT&T requests that the schedule of the release of the Final Report include an opportunity to conduct one or more technical conferences to better understand Telcordia's conclusions.

## V. CONCLUSION

Telecordia's Interim Report is described as a "snapshot in time of where we are today." Workshop, Tr. at 10 (7/22/99) (S. Khurana). From AT&T's perspective as a major test participant reading the Interim Report, the image is out of focus and indistinct. The angle the picture was taken from distorts the relative size of objects in the frame. And inadequate lighting has caused some subjects not to be visible at all.

"I'd have to know a lot more about these third-party tests than I do today to say, 'Yes, I'm willing to rely on that and put my name on it that this thing tested out and works.'" Commissioner Walsh, PUC Open Meeting, Tr. at 20-21 (10/8/98). Industry participants and regulators should not rely on Telcordia's reported test results as an indication of commercial readiness even in those areas where success has been reported. Detailed disclaimers in Telcordia's Master Test Plan and Interim Report warn CLECs that they cannot rely on the contents of the reports to draw conclusions about whether SWBT's systems will work. "[T]he results of any testing that may be conducted are not necessarily representative of the universe of potential operational conditions in normal, stress, or failure modes. . . ." Master Test Plan, Conclusion and Summary (7/16/99). Telcordia further advises readers of the Interim Report that "any use or reliance upon said information or opinion is at the risk of the user. . . ." Interim Report, Disclaimer. AT&T agrees with Telcordia that caution is indicated. Judging from their failure to detect problems readily apparent in the commercial environment, the test results run the added risk of creating false security. The "road test" underway as AT&T and other CLECs

execute and expand entry plans will provide more reliable proof of whether SWBT's OSS will work as advertised in handling the variability in mix and volume that comes with increasing competitive activity.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document was served by hand delivery or via facsimile on all parties of record in this proceeding on the 2nd day of August, 1999.

Mark Witcher

Third Party Test
Daily Issues Log

| Issue Number | Date Opened | Scenario Number | Issue | Action / Outcome | Outcome Date | Impact/ Implications |
|---|---|---|---|---|---|---|
| 1 | 3/22 | N/A | SWBT provided list of SWBT multi-line volunteers to AT&T Testing Team. This information was 2 weeks late, and caused the AT&T Testing Team to have to completely re-map scenarios to volunteers | AT&T re-mapped scenarios to volunteers based upon the information provided by SWBT | 3/29 | Due to the information being late from SWBT, AT&T moved forward and mapped scenarios to volunteers. When the information was finally received from SWBT, AT&T had to re-map all of the scenarios to the AT&T/PUC volunteers. |
| 2 | 3/29 | N/A | AT&T provided a list of AT&T and PUC volunteers that needed to have test lines installed before the test began. SWBT installed the test lines without contacting the volunteers or the AT&T Testing Team to coordinate access to the volunteer homes. | The PUC staff and AT&T Testing Team contacted all volunteers to notify them of their due dates and try to coordinate the installations | 4/16 | Volunteers were confused when SWBT showed up unannounced. Installation and scheduling issues will reflect poorly on CLECs even when the problem originates with SWBT. |
| 3 | 4/7 | 2.R.S.6.5 | SWBT caused an inside wire problem by installing service to the NID. Volunteer could only use home line on 1 jack. SWBT gave volunteer an ETR of 4/21 | Repair had to be scheduled for SWBT to remedy the error. No root cause analysis was provided. | 4/14 | Customer could not use their home line on all of their jacks as they had before the new test line was installed. Installation issues will reflect poorly on CLECs even when the problem originates with SWBT. |
| 4 | 4/7 | 2.R.S.2.5 | SWBT installer split home lines and caused them to ring on the wrong jacks | VOLT fixed SWBT's mistake for customer | 4/9 | Customer could not utilize home lines as they had before the test lines were installed. VOLT fixed the error caused by SWBT in order to quickly rectify the situation for the customer. Installation issues will reflect poorly on CLECs even when the problem originates with SWBT |
| 5 | 4/7 | 2.R.M.12.1 | SWBT replaced a jack for the customer when this was not work that was authorized for them to do. Customer complains about new jack not working | Repair had to be scheduled for SWBT to remedy error. No root cause analysis was provided. | 4/9 | SWBT provisioned unauthorized work and caused problems on the volunteer's home line. |

Third Party Test
Daily Issues Log

| Issue Number | Date Opened | Scenario Number | Issue | Action / Outcome | Outcome Date | Impact/ Implications |
|---|---|---|---|---|---|---|
| 6 | 4/7 | 1.R.S.1.13 | SWBT crossed wires during test line installation and caused severe static on home lines | Repair had to be scheduled for SWBT to remedy the error. | 4/9 | Customer was upset about the severe static. Installation problems will reflect poorly on CLECs even when the problem originates with SWBT. |
| 7 | 4/8 | N/A | All of the multi-line accounts set up by SWBT for SWBT volunteers were set up as single accounts instead of bill-on's. The AT&T Testing team was advised that SWBT would make the necessary changes by 4/9, yet it remains an open issue. | This has been an open and unresolved issue throughout testing. AT&T ultimately gave up requesting that the account set up be remedied because accurate pre-order functionality was not available during the time until the internal SWBT order altering the account posted. Because of the delay this caused in pulling pre-order information for KPMG to prepare LSRs, AT&T changed the orders to single line orders to allow the orders to go through. | N/A | AT&T experienced a delay in pulling the pre-order for KPMG to prepare the orders. The more significant concern is that the testing did not adequately address multi-line accounts set up as bill-on's. |
| 8 | 4/13 | 2.R.S.1.3 | No dial tone on volunteer test line | SWBT required to restore service. No root cause analysis was provided. | 4/14 | Customer was without service. |
| 9 | 4/14 | 1.R.M.17.1 | SWBT volunteer lost dial tone on both test lines | SWBT was required to repair (protectors were grounded in NID) | 4/16 | Customer was without service |

Third Party Test
Daily Issues Log

| Issue Number | Date Opened | Scenario Number | Issue | Action / Outcome | Outcome Date | Impact/ Implications |
|---|---|---|---|---|---|---|
| 10 | 4/14 | N/A | KPMG uncovered through testing with GEIS that the LSOR showed that the PO DATE was not required when in fact it is required for mechanized orders. LSOR discrepancy caused a delay in testing. | KPMG had to populate the field on all orders. Corrected documentation has not been shared. | N/A | Caused a 2 day delay in testing. Errors and ambiguities in LSOR documentation can impact a CLEC's system design and development and require coding changes, along with associated changes in methods and procedures. |
| 11 | 4/15 | N/A | KPMG uncovered discrepancy in the LSOR through testing with GEIS. Table in LSOR stated that REQ Type was required, but accompanying notes on the same page clearly stated that it was not required. KPMG originally formatted orders without the ReqType. | KPMG had to go back and populate the field on all orders. Corrected documenation has not been shared. | N/A | Caused a 1 day delay in testing. Errors and ambiguities in LSOR documentation can impact a CLEC's system design and development and require coding changes, along with associated changes in methods and procedures. |

Third Party Test
Daily Issues Log

| Issue Number | Date Opened | Scenario Number | Issue | Action / Outcome | Outcome Date | Impact/ Implications |
|---|---|---|---|---|---|---|
| 12 | 4/16 | N/A | The EDI business rules do not allow for multiple indents on Caption Listings. Proper rules for submitting Captions on an electronic order are needed from SWBT. | SWBT advised AT&T to check the CLEC Handbook and the Directory Matters Reference Guide. Both were checked and additional information was still required. After meeting with SWBT's Directory Listing SME, AT&T validated what SWBT will require on a Caption order. AT&T discovered that the EDI maps would need to be changed to allow for caption orders. AT&T is making changes to maps to allow for caption listings. No expanded documentation on Caption Listings has been shared. | N/A | AT&T made the provisions to add captions to its EDI maps. This issue emphasized the impact of the absence of comprehensive SWBT EDI mapping documentation. |
| 13 | 4/16 | N/A | Testing was halted because SWBT had to establish AT&T as a Client Trading Partner | SWBT established AT&T as a Client Trading Partner | 4/16 | A CLEC cannot send orders to SWBT without being identified as a Client Trading Partner. |
| 14 | 4/16 | N/A | SWBT Volunteer contacted the hotline and reported that his Inside Wire had never been installed. The AT&T Testing Team understood that SWBT had cared for all of these issues with their volunteers. | The AT&T Testing Team went ahead and scheduled the IW for SWBT. SWBT installed the Inside Wire. | 4/19 | Customer could not make and receive calls because the IW had not been installed. |
| 15 | 4/16 | N/A | When SWBT tried to send a manual 855 back on a test order, it was stopped because the response could not pass the AT&T Firewall. | AT&T opened the firewall for all responses | 4/16 | Responses could not be sent from SWBT to AT&T. |

Third Party Test
Daily Issues Log

| Issue Number | Date Opened | Scenario Number | Issue | Action / Outcome | Outcome Date | Impact/ Implications |
|---|---|---|---|---|---|---|
| 16 | 4/16 | N/A | SWBT is unable to send any automated responses back to AT&T. SWBT can only send manual responses. Status conference call scheduled for 4/19. | SWBT is sending time stamp on responses and this is causing a problem with SWBT's ability to transmit and AT&T's ability to receive an automated response. SWBT removed the time stamp. | N/A | Responses could not be sent to AT&T electronically until the time stamp was removed by SWBT. Impact of removal of time stamp from a performance data gathering perspective is unknown. |
| 17 | 4/19 | N/A | LSOR EDI Requirements documentation does not fully explain what the EDI format will look like to communicate whether a CLEC should generate an 860 or a new 850 when errors are sent back from SWBT. | AT&T held conference call with SWBT to understand what a CLEC should look for: SuperFatal - will receive message stating "re-submit as initial request"; Fatal - Error code indicated. | N/A | Orders could not be processed until SWBT clarified this issue. Modified documentation has not been shared. |
| 18 | 4/19 | N/A | AT&T volunteer has no dial tone on test line | SWBT checked and discovered problem with wire at the cross connect. AT&T contacted VOLT to check the IW. | 4/21 | Customer was without service. Service issues will reflect poorly on CLECs even if the problem originates with SWBT. |
| 19 | 4/19 | N/A | SWBT volunteer has no dial tone on test line | SWBT had facilities problem and line was never installed | 4/21 | Customer was without service. Service issues will reflect poorly on CLECs even if the problem originates with SWBT. |

| Issue Number | Date Opened | Scenario Number | Issue | Action / Outcome | Outcome Date | Impact/ Implications |
|---|---|---|---|---|---|---|
| 20 | 4/20 | 5.B.M.7.1 | Error on 855 - Address not on Mesa? AT&T will work with LSC to determine why the business address (5501 LBJ) is causing an error | Suite is needed on the order even though the pre-order address validation did not bring up the suite. | N/A | A CLEC would have to work with the LSC to determine the correct address format and content, thus causing potential delays in provisioning the order. Inaccurate and incomplete pre-order information will cause rejects. Because the LSR will then need to be Supp-ed and Supps are processed manually, rejects need to be kept at a minimum. |
| 21 | 4/20 | N/A | 8 of the 10 sanity orders came back with manual (faxed) rejects due to invalid feature USOCs. KPMG was surprised to receive any manual rejects on an order that was submitted electronically. | KPMG corrected and resubmitted the LSRs. | N/A | Manual Rejects cause potential delays in the provisioning process and create an opportunity for SWBT and CLECs to misplace faxed forms and miscommunicate error codes. If a CLEC has gone to the time and expense of creating and electronic interface to SWBT, SWBT should generate and send ALL responses back electronically. |
| 22 | 4/20 | N/A | KPMG has suspicion that some of the feature groupings (Call Forwarding and Restriction Features) are incompatible. AT&T submitted 2 more sanity orders to check. | It appears that the feature groupings are in fact OK | N/A | |
| 23 | 4/21 | | Received Manual Reject indicating error code SD2044 which is not a listed error in the LSOR. | KPMG worked with SWBT's Local Service Center (LSC) to understand the meaning of the error code, which was not contained in the last updated LSOR but was subsequently communicated to the CLEC community in an Accessible Letter. | 4/21 | CLECs must be aware of both the published LSOR requirements, and updates contained in Accessible Letters. Because of the volume, coverage and frequency of Accessible Letters (daily), a CLEC may encounter difficulty maintaining a current understanding of business rules and requirements. |

| Issue Number | Date Opened | Scenario Number | Issue | Action / Outcome | Outcome Date | Impact/ Implications |
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| 24 | 4/21 | | Error on Remote Access to Call Forwarding (RC3). KPMG followed LSOR guidelines and still received an error. | KPMG worked with SWBT's LSC. The LSC Manager indicated that /PID 4digit number must follow the USOC. This is not indicated in the LSOR. Revised documentation has not been shared. | N/A | Order could not be provisioned until SWBT provided the correct requirements for this feature. Because the LSR will then need to be Supp-ed and Supps are processed manually, rejects need to be kept at a minimum. |
| 25 | 4/22 | 1.B.M.5.1 | Received Manual Reject for invalid due date. Unclear why this would be a manual reject. This should either be sent as an electronic error or even better SWBT could send a FOC with the corrected due date. | KPMG corrected due date and resent | N/A | Order was delayed in the provisioning process due to the CLEC having to wait for the manual reject. Manual Rejects cause potential delays in the provisioning process and create an opportunity for SWBT and CLECs to misplace faxed forms and miscommunicate error codes. If a CLEC has gone to the time and expense of creating and electronic interface to SWBT, SWBT should generate and send ALL responses back electronically. |
| 26 | 4/22 | 1.B.S.4.2 and 1.B.M.7.1 | Received a FOC in error from SWBT | SWBT called to tell us that they had sent a FOC in error to us and they would be sending a manual reject on these orders | N/A | CLEC would think that these orders were confirmed and valid orders when in fact they have errors. Post-FOC rejects were not expected. The provisioning process would be delayed because of this. Manual Rejects cause potential delays in the provisioning process and create an opportunity for SWBT and CLECs to misplace faxed forms and miscommunicate error codes. |

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| 27 | 4/22 | 1RM17.1<br>3.R.M.12.1<br>2RM16.1<br>1.B.M.10.2<br>1RM10.1 | Orders rejected because TNs are not on same account. | SWBT LSC advised AT&T that the 2nd line is on a different account. AT&T confirmed that the lines put on the order were the lines provided to AT&T by SWBT. AT&T had to change these orders to single line orders to get them to go through. | N/A | The Testing Team was delayed because they had to change the orders from multi-line to single line orders. Problem with SWBT's account set up for testing means that multi-line accounts structured as bill-on's were not the subject of testing as originally planned. |
| 28 | 4/26 | 5.R.M.9.1<br>1.R.S.1.6 | Order rejected with indication that the reserved TNs werealready working TNs. AT&T validated that the TNs were properly pulled and reserved in Verigate. | 1.R.S.1.6 is a typo on the order. LSC indicated a LASR edit problem with 5RM9.1 | N/A | In production, the CLEC would have to wait for the LSC to relax the LASR edit or AT&T would have to re-reserve a new TN. Either way the provisioning process would be delayed due to SWBT. |
| 29 | 4/26 | 1.R.S.5.18<br>5.R.M.10.1<br>2.R.S.7.7<br>1.R.S.7.14<br>1.R.S.7.18<br>1.R.S.7.17<br>1.R.S.7.3<br>1.R.S.4.6 | Received reject on orders for an incorrect CLLI when the CLLI on the order matched what was pulled in Verigate. | AT&T was provided a different CLLI in Pre-Order than what the LSC says the CLLI should be. AT&T changed the CLLIs but this does not address inaccuracy in pre-order information. | N/A | In production, AT&T would have to work with the LSC to determine the correct CLLI that the order requires. This would delay the provisioning process. In addition, the reject of the original LSR means the order will be processed manually as a Supp. Inaccuracy in pre-order information raises serious parity concerns because SWBT service representatives are not required to include CLLI codes when provisioning POTS retail customers. |

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| 30 | 4/26 | 5.B.M.11.1 and 5.B.S.2.1 | Received manual reject for invalid due date. However, AT&T had already received FOCs on these 2 accounts | AT&T resubmitted orders | N/A | Post-FOC rejects for invalid due date mean that the customer's expectation on provisioning will not be met. Also, manual Rejects cause potential delays in the provisioning process and create an opportunity for SWBT and CLECs to misplace faxed forms and miscommunicate error codes. |
| 31 | 4/26 | 2.R.S.1.1 and 2.R.S.4.3 | Cannot provision Orders because Pre-Order shows unavailable for the TNs | Will not be able to Provision the Orders | N/A | In production, CLEC would have to work with SWBT directly to gain access to these TNs. The provisioning process would be delayed. |
| 32 | 4/26 | 1.R.S.5.18 2.R.S.5.2 5.R.M. 16.1 | Received error for invalid USOCs - Usage Sensitive Features not available in UNE. Usage Sensitive Features are available to AT&T for UNE. | KPMG type-o'd the USOC | 4/27 | |
| 33 | 4/26 | 1.R.S.7.7 | Order should have rejected due to the data put in the optional fields. | SWBT indicated that it does not validate optional fields | N/A | Unclear how incorrect data in optional fields will be detected. |
| 34 | 4/26 | 2.R.S.4.1 and 2.R.S.5.7 | Cannot provision orders because the name on the CSR does not match the name of the volunteer. AT&T validated that the TN was what SWBT installed. | AT&T will not send orders on these two accounts | N/A | |
| 35 | 4/26 | 5.B.M.8.1 | Received error from SWBT regarding hunting. AT&T did not understand the errors but thought they might have something to do with the SWBT or AT&T EDI map. | Worked with SWBT SMEs. In a 5/19 conference call it was finally determined that there is a discrepancy in the SWBT documentation. SWBT acknowledged the problem and indicated the issue would be clarified in the publication of LSOR 4. | N/A | In a production environment, 3 weeks to resolve an issue is unacceptable. The provisioning of all orders requiring hunting were delayed by over 3 weeks because AT&T could not get SWBT SMEs to meet with AT&T to determine if the issue was a coding issue or documentation issue. Receiving accurate and timely issue resolution will be critical in a commercial environment. |

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| 36 | 4/26 | 5.R.S.2.1; 2.R.S.3.4, 2.R.S.7.3 2.R.M.13.1 | Received errors for invalid addresses when the addresses match the data retrieved in pre-order. | Correct address information (which was different from the address available in pre-order) had to be obtained from SWBT LSC. | N/A | Provisioning process was delayed because AT&T had to work with the LSC to determine the correct address format. Inaccurate pre-order information may require additional contact to be made with the customer. In addition, having to Supp the order with the correct information means that the order will not be worked electronically and instead will be subjected to the error and delay inducing risks of manual processing. |
| 37 | 4/26 | 1.R.S.4.16 | SD2094 Error received but not in LSOR; LSC is investigating definition | SD2094 was defined in an Accessible Letter. | 4/27 | CLECs must not just code and complete fields to LSOR requirements, but also to the Accessible Letters sent daily. |
| 38 | 4/27 | N/A | Uncovered that SWBT is sending many 865's without a version and KPMG Tracking Mechanisms do not process these. Therefore, AT&T probably has more SOCs but cannot access them because SWBT is not sending the version on all 865's as it should. | SWBT does not send a version on AA orders. To compensate for the inadequacy in SWBT's record, AT&T made changes in its systems to still accept an 865 with no version. | N/A | KPMG had to re-program the tracking tool to recognize that any responses received without versions were AA vers. SWBT's failure to include the information in the responses sent to CLECs makes tracking more difficult and imposes additional development work on CLECs. |
| 39 | 4/28 | 3.R.M.10.1 | After converting volunteer's line to UNE, volunteer sent test log in stating that both test lines lost dial tone. | AT&T had trouble putting in a trouble ticket on 4/28. Finally got Trouble Ticket to go through on 5/3 and dial tone was restored. | N/A | Customer lost dial tone and was unable to make inbound and outbound calls. Customer had to go several days without dial tone because we were unable to process a trouble ticket in SWBT's Trouble Administration. Due to SWBT's delay in posting CLEC orders, CLECs are unable to process mechanized Trouble Tickets and access MLT for at least 24 hours (and sometimes days) after the receipt of a SOC. |

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| 40 | 4/28 | N/A | AT&Tmade contact to inflict problems on volunteer's line. When attempt was made to inflict trouble, it was found that the line was provisioned as one way. Therefore there is no trouble to inflict. The line should not have been installed as one-way | AT&T submitted the trouble ticket anyway | N/A | SWBT incorrectly provisioned the line which caused the customer to not be able to receive calls. |
| 41 | 4/28 | N/A | Volunteer called the hotline to tell us that his 2nd home line still has problems due to the SWBT installation of his test line. Due to the installation of the customer 's test line, SWBT caused an Inside Wire problem on the customer's primary home line. The customer was not able to use one of the jacks in his home. | Dispatch by SWBT was required to correct the problem | 5/3 | Installation issues will reflect poorly on CLECs even when the problem originates with SWBT. |
| 42 | 4/28 | 2.B.M.7.2 | Sent a change order and SWBT sent back a manual reject for invalid ATN. AT&T testing team talked to the LSC. LSC reporting seeing a SOC on the account to convert it to UNE, but the LSC does not have a record on the customer so a change order cannot be processed. SWBT apparently does not create a CLEC customer record before generating SOC. | Record finally showed up at SWBT's LSC and AT&T was able to process the change order. | N/A | Due to the SWBT delay in posting CLEC completions to all internal SWBT systems, CLECs are unable to process change, disconnect and maintenance orders on recently converted accounts. In this instance, AT&T had to wait 5 days to process the change order. The delay raises significant concerns because of the likelihood that such orders will be received frequently on recently converted and newly created accounts. |
| 43 | 4/28 | 1.R.S.7.7 | Volunteer could not test features because dial tone was lost when the customer was converted to UNE | Submitted Trouble Ticket Number 2104952134 on 5/5. Trouble was fixed on 5/6. | N/A | Customer lost dial tone and was unable to use her line. Root cause unknown. |
| 44 | 5/3 | N/A | Plan to send 3 initial orders, 5 Disconnects and 7 change orders to test SWBT EDI Release. | Tested and issues found. See Issues 77-81 | N/A | See Issues 77-81 |

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| 45 | 5/3 | 214-987-2510; 972-788-0781; 817-557-2493; 210-495-2134 | When AT&T attempts to submit a trouble ticket, a message is received stating "Unauthorized to access this information. Contact support center to report trouble or obtain status information." | AT&T contacted the Helpdesk and was told to contact the LSC because there might be a pending order. (Note: All 4 of these orders have SOC'd so there should be no pending orders.) Helpdesk updated AT&T's rep profile, but AT&T was still not able to input trouble reports on 3 of the 4 TNs. SWBT's LOC told AT&T that they have now uncovered some bugs in the latest Toolbar Release which may be preventing CLECs from being able to access Toolbar. IS Call Center blamed the issues on AT&T's Profile, but AT&T still has problems inputting Trouble Tickets and checking status on tickets that supposedly cleared. After working with the LOC again, they manually input the lines so that AT&T could submit mechanized trouble tickets. (Note: AT&T representative can submit troubles on UNE lines with her Resale ID and Vice Versa - this is a security violation.) | | AT&T experienced quite a delay in processing trouble tickets due to the fact that one SWBT entity would refer us to another SWBT entity for problem resolution. AT&T suspects this issue is related to the SWBT delay in posting completions through all of SWBT's internal systems. CLECs must be able to process mechanized Trouble Tickets on orders for which service order completions have been received. |

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| 46 | 5/4 | | Received 7 Manual FOCs, 6 at 1:48 PM and 1 at 2:58 PM. | SWBT took down systems to fix issues related to the 5/1/99 release. AT&T will continue to receive manual FOCs and SOCs on orders that were in the system that day. LSC does not anticipate additional system issues. | N/A | Receipt of manual responses to electronic EDI LSRs is unaccepetable. Manual processes introduce the potential for error and delay and complicate AT&T's ability to process and respond to the noficiations electronically. Additionally, because receipt of manual responses would not have been predicted as a likely fall out from the coverage of the 5/1 release, the problem emphasizes the need for adequate testing (internal and external) and regression testing in advance of implementing new releases. |
| 47 | 5/6 | | Uncovered that AT&T can send the same PON and VERs to SWBT mulitple times without receiving back an error stating that it is a duplicate PON. | N/A | N/A | A CLEC could mistakenly send the same PON and VER and it appears that SWBT will still process both. The fact that SWBT does not error duplicate PONs and VERs could cause a serious tracking problem for the CLECs. The failure to reject duplicates also raises data integrity issues associated with SWBT's use of the Folders process because LSRs are "stored" and possibility of processing duplicate and inconsistent orders appears to exist. |
| 48 | 5/6 | All manual FOCs and SOCs | AT&T received numerous manual FOCs and manual SOCs. The Remarks section of the manual form always indicates a handwritten date and time stamp which is completely different (sometimes even days different) from the fax time stamp recording AT&T's actual receipt of the manual form. | N/A | N/A | If the handwritten time stamp is the reference point for reporting performance measurements data, then the information being calculated for the PM requirement is inaccurate and misrepresents the time the manual responses are received by CLECs. The implications of receiving manual respones are discussed elsewhere. |

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| 49 | 5/6 | 5RS1.3, 5RS5.1, 4RM17.1, 5RM13.1, 5RS1.2, 5RS1.1 | Received Exception Log stating no subscriber access needed to supplement the due date on the order. When AT&T tried to sup the order, an error message was returned. | AT&T worked with the LSC and they determined that a problem in LASR was causing AT&T not to be able to sup these orders. The LSC said that they could have the issue resolved by Monday 5/10. The LSC said that AT&T could manually send sup's through on any orders AT&T needed processed before Monday. | N/A | AT&T was unable to send mechanized sups to SWBT for 4 days. Because supplements are sent to correct rejected LSRs and to process pre completion changes, including changes in due dates, the lack of electronic processes could introduce both error and delay. |
| 50 | 5/6 | 1.B.S.3.2 | Received manual FOC and SOC on 5/6 for an order that was placed on the previous day, Wednesday 5/5, indicating continuation of SWBT systems problems on Wednesday as well. | Refer to Issue 46. Prediction of system fix did not prove to be accurate. | N/A | Refer to Issue 46. |

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| 51 | 5/6 | | AT&T has not yet been able to get a caption order through SWBT. AT&T has checked its LSRs and EDI maps to ensure that they are correct. | AT&T escalated to SWBT EDI SME. SWBT EDI SME called late Thursday to tell AT&T that there is a problem in LASR with the DSCR for Caption orders. She said they are trying to fix it, but do not have estimated time of repair. This issue is effecting about 35 of the AT&T test orders. Finally, a conference call was held on 5/19 with the SWBT SMEs and a determination was made that the problem was caused by an issue with the SWBT EDI map. SWBT fixed the map on 5/20 | 5/20 | It took weeks to get SWBT to resolve the problems they had with their EDI maps. This issue alone caused a 3-week delay in processing ALL caption orders. In a production environment, a CLEC cannot survive with this pace of SWBT problem resolution. |
| 52 | 5/6 | 2RS3.4<br>2RS7.3 | Customer Service Record obtained in pre-order shows no cities so the order errored. | LSC gave AT&T the correct cities manually so that the orders could go through. | N/A | This issue caused a delay in processing and also caused extra work for the CLEC due to the fact that AT&T had to work with the LSC one-on-one to obtain the needed information to process the order. The city information should have been available from the CSR. No solution other than obtaining the missing information manually was identified. |
| 53 | 5/11 | 1RS4.8 | Volunteer called to notify us that he too lost dial tone when his line was converted. | Submitted maintenance ticket and trouble was cleared on 5/15 | 5/15 | Customer lost dial tone and was unable to make an receive calls until the trouble was cleared by SWBT. |

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| 54 | 5/13 | 5RS2.1 | AT&T received a SOC on this account. VOLT went out to install the Inside Wire to find that SWBT had not completed its Outside Wire. | AT&T planned to put in a maintenance ticket on this account, even though AT&T should not have ever received a SOC before provisioning was completed. AT&T's service representative could not input a trouble ticket with her UNE ID. AT&T worked with the IS Help Desk. SWBT manually inserted the number for AT&T to submit a trouble ticket. | N/A | A serious delay in processing was caused by this SWBT error. AT&T does not send its Inside Wire vendor out until a completion is received from SWBT because dial tone cannot be confirmed until all work is completed by SWBT. In this case, VOLT went out and could not finish its work because the Outside Wre had not been completed by SWBT. AT&T had a very unhappy customer, who was required to again be at home to allow VOLT access to the home after SWBT finally completed its Outside Wire. No explanation has been received as to why the Outside Wire work had not been completed or why the SOC had been sent. |
| 55 | 5/13 | N/A | Sent Sanity Test to validate capacity orders. 3 orders came back with rejects due to incorrect CLLI's when the code had been provided by SWBT through Verigate. | On 1 of the 3 orders, the LSC showed a different CLLI code, and on 2 of the orders the LSC showed the same CLLI code. The LSC later came back and gave AT&T 2 different CLLIs so that AT&T could send the orders through. | N/A | In a production environment, invalid pre-order information puts a CLEC at a great disadvantage. The CLEC has to delay the provisioning of customer orders because it will have to work individually with the LSC to obtain the correct information. No explanation was provided as to why the LSC in some instances pulled up the same incorrect information and in another instance pulled up different pre-order information than was available to AT&T through Verigate. Because data, including the CLLI code, is required on CLEC orders for POTS-like UNE orders and not required on SWBT retail POTS orders, CLECs are impacted negatively and disproportionately when pre-order information is inaccurate. |

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| 56 | 5/13 | N/A | Sent Sanity Test to validate capacity orders. One order came back with an incorrect address even though the address submitted had been obtained from SWBT through Verigate. | AT&T worked with the LSC, which showed the same address that AT&T had used and that caused the order to error. The LSC told AT&T that there was no other information that could be put on the order to cause it to go through. AT&T will still include this test seed to represent a mechanical LASR error, but the fact that there is nothing to do to correct the order is unacceptable. | N/A | In a production environment, invalid pre-order information puts a CLEC at a competitive disadvantage. The CLEC has to delay the provisioning of customer orders because they have to work individually with the LSC in an attempt to obtain the correct information. Refer to other pre-order issue discussions for additional consequences associated with inaccurate and incomplete pre-order information. |
| 57 | 5/13 | 05RS01101CF 3200 | Order sent to test Cable Facilities Problems. Received Manual Reject for Network Interface Device. | AT&T will cancel this order. | 5/13 | |
| 58 | 5/13 | 05RS01101CF 3201 | Order sent to test Cable Facilities Problems. Received Electronic Jeopardy, account has not shown up on the Exception Log as it should. The Due Date was 5/12. LSC indicated that a manual reject was sent after AT&T had already received a FOC. | This order never showed up on an Exception Log and never SOC'd. AT&T had to work with the LSC to obtain status. | 6/1 | Since the order did not show up on the Exception Log, AT&T did not know what happened to the order. Because AT&T had to work with the LSC to obtain the status, provisioning was delayed. |
| 59 | 5/17 | 5.R.S.12.1 | One of the TNs reserved in Verigate makes the order error because the TN is already a working TN. | AT&T will submit the order without this TN even though that does not resolve the issue of having received inaccurate pre-order information. | N/A | Had this been a production order, AT&T would have had to go back and re-reserve TN's in Pre-Order which would have delayed the provisioning process. Customers would also have received inaccurate information in the negotiations process concerning available telephone numbers. |

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| 60 | 5/17 | 5.R.S.6.3 | Version BA - AT&T received mechanized error on 5/14 (after the Missing Response list was provided to SWBT), even though the date on the receipt from SWBT was 5/4. SWBT could not have sent it on 5/4 because AT&T validated that it was sent into the AT&T gateway on 5/14 to an entirely different IP Address then it would have been sent to on 5/4. Version CA - received a FOC, after which AT&T received a manual reject. The FOC was sent in error. | N/A | N/A | In addition to other issues discussed elsewhere, the receipt of manual rejects following the receipt of a FOC is unacceptable for a number of reasons. The receipt of the FOC should mean that a valid order has been received and a due date confirmed. Subsequent receipt of rejects, for example, may impact due dates and may result in inaccurate data on return of FOC interval measurements. |
| 61 | 5/18 | 5.R.S.5.1 | Received a manual Reject stating Call Waiting USOC was duplicate. | AT&T checked order and validated that the USOC was not in duplicate. This would indicate a problem in the SWBT's translation of the order. LSC said it would manually fix the issue to get the order to go through until they could get a permanent fix in place. | N/A | The provisioning process was delayed because AT&T had to stop and individually work with the LSC on this order to find out the cause of the problem. After the LSC figured out the issue, AT&T had to wait an additional 2 days for the manual fix. |
| 62 | 5/18 | 5.R.S.5.2 | Received FOC on 5/10 but never received a SOC. | LSC indicated that a manual reject for apartment number should have been sent on the order but was not. Apartment number was added to the order and the order was re-submitted. | N/A | Receiving rejects after receipt of a FOC, as discussed above, is unacceptable and may result in missed due dates. Here, the additional problem (failure to return a reject) was identified but not resolved. |

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| 63 | 5/18 | | AT&T was instructed by the PUC to re-submit the orders that have missing responses from SWBT. | N/A | 5/18 | In a production environment, AT&T would not just re-submit lost orders. AT&T would have to work individually with SWBT to determine what happened and to ensure that orders sent in the future were not lost. By re-submitting these orders, the root cause analysis process was not adequately exercised or tested. |
| 64 | 5/18 | 1R.S.5.9 | Re-submitted one of the missing orders that SWBT claimed encountered a Fatal MOG error on 4/21. KPMG re-sent the exact version of the order changing only the due date. The order should have errored for the MOG error and duplicate order; instead, the order FOC'd. Therefore, it appears as though SWBT did not ever send a Fatal MOG response on this order. | N/A | N/A | See previous discussion on resubmitting lost orders. |
| 65 | 5/19 | N/A | SWBT resent over 100 Responses that AT&T had already received weeks ago. This mistake caused a major disruption in AT&T's tracking mechanism - now orders that have already received SOCs show to be in error or FOC status. | KPMG was required to go in manually to clean up and validate the status of all orders. AT&T contacted SWBT and told them NOT to re-send anything. | N/A | KPMG spent valuable time having to go back and manually update the tracking tool. No explanation was shared as to why SWBT resent the prior responses and, thus, no assurance has been received that this problem will not arise in the commercial environment. Such an error could disable a CLEC's tracking mechanism. |

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| 66 | 5/25 | N/A | AT&T tried to access Trouble Administration on 15 recently SOC'd UNE lines (SOC 5/20 - 5/24), received the error "Unable to access." | AT&T showed this to Bellcore but received no assurance that the issue was being documented. Based on Bellcore's comments, AT&T is concerned that Bellcore does not appreciate the seriousness of a CLEC being unable to access Trouble Administration on newly processed accounts. AT&T contacted the IS Help Desk and they manually put in the 15 numbers so that AT&T could access the lines. A CLEC should not have to contact the IS Help Desk for them to manually input a CLEC's record. As soon as a CLEC receives a SOC, the CLEC should be able to access the accounts via Trouble Administration. | N/A | Due to SWBT's internal posting problem, CLECs cannot submit electronic trouble tickets following receipt of the SOC. The issue causes a serious delay in a CLEC's ability to submit and resolve maintenance issues during a critical time period. AT&T believes the lack of access will negatively impress new customers, particularly because of the likely high occurrence of service inquiries immediately following provisioning. |

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| 67 | 5/25 | 1RS4.2 | AT&T tried to put in a trouble ticket and could not because Toolbar indicated that the line had been disconnected. AT&T had not sent a disconnect on this line | AT&T again worked with the IS Help Desk and they manually fixed the record. | N/A | Having to work individually with the LOC caused a delay in issuing and clearing the trouble. No explanation was provided as to why the account appeared to be disconnected. Inaccuracy in status records will place CLECs at a competitive disadvantage in being able to quickly and adequately address queries and problems raised by customers. |
| 68 | 5/26 | Capacity | AT&T successfully transmitted all orders in the proposed timeframe. At 1:07, AT&T started to observe SWBT slow down in sending responses back to AT&T. AT&T waited an hour and noticed that hundreds of orders had been sent but failed at SWBT. | Bellcore, AT&T and SWBT got on a conference call at 3:30 and nothing could be determined. AT&T reconvened the conference call on 5/27 and was advised that SWBT could not receive concurrent FTP (file transfer protocol) sessions that have multiple data set names. AT&T asked SWBT to provide documentation that would outline options that would fix the problem. AT&T then counter-proposed a solution which SWBT accepted. AT&T will expedite its internal Change Control Process to change the format AT&T uses to transmit orders to SWBT. | N/A | AT&T has been in testing with SWBT for a year now using file naming conventions that were shared with and approved by SWBT. This issue should have been identified and resolved by SWBT before this capacity test. If this had happened in AT&T's production environment, SWBT would have lost 2,660 AT&T orders. AT&T believes limitations at SWBT's end that impact file naming conventions should be in writing and available to all CLECs. |

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| 69 | 5/27 | | Provided a new list of 7 missing orders to LSC Manager on 5/2. | On 6/2 SWBT responded that all 7 had been manually rejected to AT&T. AT&T did not receive the manual rejects and had to work with the LSC to obtain copies. The LSC re-sent the manual rejects. | N/A | In production, AT&T would have to individually work with the LSC to determine what happened to each and every missing response. This would cause a substantial delay in the provisioning process. The issue of whether the manual reject had or had not been sent and received highlights additional problems that can be encountered when manual notifications are created and sent in response to electronic LSRs. |
| 70 | 5/28 | 2BS3.2 ; 5RS3.2; 8BM13.1 | Sent sups on these orders and received rejects on all indicating that SWBT did not recognize the AA version of the PON and the order needed to be re-PON'd. | AT&T re-PON'd the order and received a FOC, with the issue still outstanding as to why SWBT did not recognize and accept the sup. AT&T escalated this to LSC. On 6/4, SWBT reported that the AA version rejected due to LASR Super Fatal errors, thus preventing the order from being supp-ed. | 6/4 | Explanation of problems should be available with less time delay. |

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| 71 | 6/3 | 9 new Missing Responses | AT&T uncovered a third list of 9 orders that are missing responses. | AT&T escalated to the LSC and e-mailed the list to SWBT on 6/3. Received a response back on 6/7 that the orders were manually rejected except 05RS00603000280. Apparently, when SWBT went out to complete the Outside Wire on 5/28, access was denied. This should have shown up on the Exception Log and come back to AT&T on 5/28 as a mechanized Jeopardy but did not. The SWBT LSC Manager indicated that he would address this issue internally. | N/A | In a production environment, SWBT's failure to communicate that the customer had denied access for the OW work would have left AT&T without critical information concerning the provisioning and status of the order. If AT&T had known the day that completion was in jeopardy, AT&T could have worked with the customer to find out what the problem was and resolve it. SWBT's inability to provide critical status information in such a low volume setting raises serious issues regarding the quality of communication that can be expected as order volumes ramp up. |
| 72 | 6/3 | 8RS2.7 | Received manual reject for ECCKT (circuit id codes) not found even though AT&T sent the ECCKT on the order. | AT&T escalated to the LSC and the LSC confirmed that it could see the ECCKT on the order. Upon investigation, the LSC discovered that the Initial Order 1RS5.10 was accidentally disconnected before the SOC was received on the change order. The reject error explanation was confusing considering the condition that caused the problem. | N/A | The provisioning process was delayed because AT&T had to work with the LSC to understand the response to the change order. Accurate and understandable reject notifications are essential in a commercial environment. In addition, reject notifications should be electronically generated and transmitted. |

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| 73 | 6/3 | Overall observation | Timely call-backs and problem resolution is inexplicably slow with the LSC and other groups within SWBT. | | | The working of issues and completion of provisioning of customer accounts are delayed by SWBT's lack of urgency. |
| 74 | 6/3 | 8RS9.2 | AT&T received manual reject stating "Requests for separate end users requires separate LSRs" AT&T does not understand this reject because the LSR had only 1 end user. | LSC researched and found that the reject resulted because the LTN field was populated with a different customer name. KPMG will make the change and re-submit the order. | N/A | See discussion in connection with Issue 72, regarding receipt of accurate and understandable reject notifications in electronically generated and transmitted responses. |
| 75 | 6/3 | 26 Pre-Orders | 26 of the CSRs pulled for the Initial Orders were missing cities. Several times the city which SWBT required on the LSR was actually a county name, ie. Tarrant County instead of Ft. Worth. | AT&T provided copies of the CSRs to Bellcore | N/A | The provisioning process is delayed because a CLEC must work one on one with the LSC to determine what information should be populated to allow the order to process. See prior discussions of inaccurate and incomplete pre-order information. |
| 76 | 5/28 | | AT&T inserted 1 live account to be provisioned by SWBT in the Capacity Test. The order actually should have been rejected for Invalid Due Date. Instead, the order fell out to the LSC and the LSC Representative called to notify AT&T that the order was going to reject for the Wrong AECN. The order did not have the wrong AECN -- it just looked wrong to SWBT because it was the Capacity Test AECN. | | N/A | If the testing is blind, the AECN should not have been recognizable to the LSC and should not have signaled different treatment. The response to the live account order raises further concerns that SWBT is hand holding the test orders. |

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| 77 | 4/30 | 23 PONs | 23 PONS came back on 4/30 with the first element of the BCA or BAK 855 header information missing (Indicators of whether response is a FOC, SOC or Reject. | Problem associated with implementation of the 5/1 release. | N/A | In a production environment, AT&T would have to stop and work one on one with SWBT to determine if the response was a FOC, SOC or error that might delay the provisioning process. CLECs could not have predicted that this problem would have been created through SWBT's implementation of the changes announced for the 5/1 release, thus reinforcing concerns raised about the inadequacy of SWBT's change control processes and practices. |
| 78 | 4/30 | 45 PONs | 45 PONs came back with a fragmented ECCKT. | Problem associated with implementation of the 5/1 release. | N/A | If a response is received back and improperly formatted from SWBT, this would cause manual processing for the CLEC. The CLEC would have to manually process the response in order for it to flow through a CLECs internal systems. An accurate ECCKT is essential in order to process subsequent order activities. See also prior discussions relating to the impact of the premature implementation of the 5/1 release and associated problems with change control management. |
| 79 | 5/4-5/7 | | Received manual FOCs and SOCs on and off throughout the week. | Problem associated with implementation of the 5/1 release. | N/A | Manual Responses slow down the provisioning process because they do not come to the CLEC as fast as electronic responses do and because they increase the potential for error. See prior discussions regarding manual notifications and regarding change control management problems. |

Third Party Test
Daily Issues Log

| Issue Number | Date Opened | Scenario Number | Issue | Action / Outcome | Outcome Date | Impact/ Implications |
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| 80 | 5/3 | 1 PON | Received 1 PON with spaces instead of periods in the ECCKT. | Problem associated with implementation of the 5/1 release. | | If a response is received back improperly formatted from SWBT, this would cause manual processing for the CLEC. The CLEC would have to manually process the response in order for it to flow through a CLECs internal systems. See Issue 78, above. See prior discussion of change control management problems with 5/1 release. |
| 81 | 5/4 | 6 PONs | Received 6 PONs with slashes instead of periods in the ECCKT. | Problem associated with implementation of the 5/1 release. | | If a response is received back improperly formatted from SWBT, this would cause manual processing for the CLEC. The CLEC would have to manually process the response in order for it to flow through a CLECs internal systems. See Issue 78, above. See prior discussion of change control management problems with 5/1 release. |

Third Party Test
Daily Issues Log

| Issue Number | Date Opened | Scenario Number | Issue | Action / Outcome | Outcome Date | Impact/ Implications |
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| 82 | 6/21 | Capacity Test | AT&T experienced a 2 minute delay in SWBT receiving orders starting at 2:21. | At 4:30 Bellcore called a conference call with AT&T and SWBT to find the root cause of the problem. SWBT said they did not see a problem, but somehow the problem was fixed. | N/A | SWBT systems slow down significantly when volumes are being sent. In production, this would cause a serious delay in provisioning. The fact that Bellcore called a conference call between AT&T and SWBT while testing was in progress, gave SWBT the opportunity to fix the issue before the test was completed. Therefore, the results are skewed and the opportunity to measure response time when SWBT has all but pinpoint realtime awareness of when orders will be sent was lost. AT&T does not understand why SWBT was alerted to the delay issue during testing. This is further evidence of a lack of blindness in testing. |
| 83 | 6/22 | Capacity Test | AT&T finished sending the Capacity orders at 5:50 PM 6/21 and continued to receive FOCs until 4:20 AM 6/22. | | N/A | SWBT systems slow down significantly when volumes are being sent. In production, this would cause a serious delay in provisioning. |
| 84 | 6/22 | Embedded Capacity Orders | AT&T embedded orders with a valid due date for provisioning. On three of the conversion orders AT&T received a FOC on 6/21 with expected completion on 6/22. The orders did not complete. Two of the orders were "New" orders with a 6/25 Due Date. The "New" orders also did not complete. | | N/A | The failure of a handfull of embedded orders to complete during the capacity testing phase raises serious issues as to whether the capacity test environment mirrors the systems and processes that will handle anticipated commercial volumes. |

| Issue Number | Date Opened | Scenario Number | Issue | Action / Outcome | Outcome Date | Impact/ Implications |
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| 85 | 6/23 | Re-Do of Capacity Test | AT&T sent 200 sup's to change the due date from 10/31 to 6/29. Of the 200 orders sent, AT&T received a manual reject on 181 of the orders for "Invalid Sup Type". Nineteen of the orders received FOC's. AT&T worked with the LSC to understand the manual rejects. SWBT's LSC indicated that the ECCKT on the BA sup version was different from the ECCKT on the AA version. AT&T informed the LSC that (consistent with SWBT's LSOR) AT&T did not assign any ECCKTs to either the AA or BA version of the orders. | The LSC Manager later informed AT&T that SWBT should not have rejected the 181 orders. He acknowledged that SWBT assigned the ECCKTS to the orders. Therefore, any mismatch would be a SWBT error. | N/A | The fact that the ECCKTs on the BA version are different from the ECCKTs assigned by SWBT on the AA version again raises questions as to manual processes at SWBT's end that are not being tested in the OSS testing. No explanation has been provided as to why SWBT assigned invalid ECCKTs to the AA versions. The ECCKT assignment issue introduced through SWBT's error prevented AT&T from testing flow through on Sups, raised additional issues as to why even inaccurate error messages are sent manually, and raised overarching issues as to the realism represented in the capacity testing phase. |
| 86 | 6/23 | Re-Do of Capacity Test | Received a call from SWBT's LSC asking if AT&T wanted the LSC to actually work the orders that had come in with the Capacity AECN. When AT&T responded "yes", SWBT expressed surprise at having received orders with the Capacity AECN into the LSC because the orders with the Capacity AECN bypassed the Facility Check process. SWBT stated that a FID was being added to the Capacity orders to keep the orders from provisioning. SWBT stated that SOCs might be received on Capacity orders but work would not actually be provisioned. | N/A | N/A | The OSS Capacity Test (in addition to other issues AT&T has raised) is not designed to replicate production orders, systems, and processes. The test will not validate SWBT's ability to handle CLEC order volumes. The test as designed did nothing to address end-to-end processing capability. The test as delivered and executed reveals additional inadequacies. The bypassing of ordinary and required steps, for example, the facility check process, invalidates any output from the capacity testing conducted. |

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| 87 | 6/25 | 8RS2.8 | AT&T received a manual reject after receipt of a SOC. | SWBT's LSC indicated that the Manual Reject had been sent in error and the order had in fact completed. | N/A | Inaccurate order response notifications create turmoil for a CLEC. A CLEC's own internal tracking mechanisms are not designed to process manual rejects A CLEC will need to stop and work one on one with the LSC when a manual notification is received. The receipt of inaccurate message responses further complicates both the CLEC's internal response and its resubmission. |
| 89 | 6/25 | 5RS3.5 | Received a FOC and SOC on this account, then the PON showed up on the Exception Log for "No Subscriber Access." | AT&T worked with the LSC. SWBT indicated that the SOC was sent in error. | N/A | A CLEC should not receive misleading FOC and SOC messages. Orders for which a FOC and SOC have been received should not appear on an Exception Report indicating that the order is not complete. Additional review is needed as to the source and accuracy of SWBT's response notifications. |
| 90 | 6/25 | 9BS1R2 | This is an order to Restore a 2 line account that AT&T had previously suspended. AT&T received an error for Invalid TN's. | AT&T worked with SWBT's LSC and they admitted that they mistakenly suspended only 1 TN instead of the 2 that were included on the suspend order. Therefore, AT&T received an error on its Restore order which was intended to restore 2 lines. | N/A | A customer would continue to receive billing for the line that should have been suspended. |